

## Details of Representations Received to the Proposed Submission Local Plan (Reg19) February 2025

### Carbon Neutrality and Designing for Low Carbon Infrastructure

This document has been prepared to provide details of the representations received to the Proposed Submission Plan and the Council's response. It draws upon information contained within the submitted documents SD07b [\*Regulation 22 Statement of Consultation Part 2 \(November 2024\)\*](#) and SD16 [\*Regulation 20 representations \(November 2024\)\*](#). It is not considered that this document contains information which is substantially different to that set out within those submitted documents, but it has been prepared to assist in navigating and considering the representations received and Council Response.

For each plan policy or associated document, it sets out some key information from the regulation 22 statement regarding the number of representations received, representation numbers, an overall summary of responses made, and a list of the main issues raised by the representations. It then contains all of the representations recorded against that Plan policy or document, along with links to supporting documents. Finally, it sets out the Council's response to the representations made for that Plan policy or document, and any changes the Council now recommends are made to the Plan policy or document, alongside any other relevant information.

This has been updated to include comments that were submitted by Historic England but were not entered onto Citizenspace and therefore they were not included in the original version of this report.

Local Plan Reference or document	Policy CN1 Mitigating and Adapting to Climate Change	
Total Number of Representations received.	32	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	23	4
Sound	13	15
Complies with Duty to Cooperate	25	2
<p><b>Summary of Representations</b>  58% of responses received support the policies in the Local Plan that aim for a net-zero district by 2030. Key issues identified include the need for clear policy clarity and viability, as 35% of comments expressed concerns over ambiguous language and the potential impact of these policies on affordable housing. 29% of comments focus on aligning local plans with national standards to maintain relevance amidst changing regulations. 26% of the comments received comment on environmental impact and green infrastructure and the need to integrate nature-based solutions while addressing financial viability. 23% of the comments refer to transportation and emissions and concern that they were lacking robust targets, urging improvements like enhanced public transport to meet net zero goals. Concerns was raised on the need to balance development viability and stringent environmental targets, urging flexible policy criteria to accommodate site-specific challenges. Transportation and local infrastructure considerations account for 13%, and the need to minimise car dependency. Renewable energy and water conservation focus was supported and the need to prioritise climate challenges in planning.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)  <b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)  <b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/24/CN1</b>  ANON-AQTS-3BSY-T/35/CN1  ANON-AQTS-3BB7-7/1/CN1  ANON-AQTS-3B4K-D/4/CN1  ANON-AQTS-3291-8/3/CN1  <b>ANON-AQTS-32CD-5 - Colden Common Parish Council/21/CN1</b>  ANON-AQTS-32GC-8/5/CN1  ANON-AQTS-32GG-C/5/CN1  ANON-AQTS-32UM-Z/3/CN1  ANON-AQTS-32NS-Y/4/CN1  ANON-AQTS-3B5G-A/3/CN1  ANON-AQTS-32NR-X/6/CN1  ANON-AQTS-329Q-8/15/CN1  ANON-AQTS-32UU-8/3/CN1</p>		

ANON-AQTS-32U5-8/3/CN1

ANON-AQTS-3BQA-Z/7/CN1

**ANON-AQTS-327U-A - Southern Water/15/CN1**

ANON-AQTS-3BX4-T/5/CN1

**ANON-AQTS-32FT-R - New Alresford Town Council/3/CN1**

ANON-AQTS-32TW-9/3/CN1

**ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/7/CN1**

ANON-AQTS-3B8M-K/6/CN1

**BHLF-AQTS-32EK-E - Test Valley Borough Council/4/CN1**

**BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/7/CN1**

**BHLF-AQTS-3282-8 - Natural England/8/CN1**

BHLF-AQTS-328X-E/8/CN1

BHLF-AQTS-3286-C/8/CN1

BHLF-AQTS-328G-W/8/CN1

BHLF-AQTS-328K-1/7/CN1

BHLF-AQTS-32QY-8/5/CN1

BHLF-AQTS-32QQ-Z/5/CN1

**Main issues raised in representations received in regulation 19 consultation.**

- Whether Policy CN1 should include specific targets and how these could be monitored;
- Aligning the policies in the Local Plan on net-zero standards with national standards;
- Transport and enhanced public transport to reduce car dependency; and
- Renewable energy and water conservation focus was supported.

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Guy Robinson
<b>Personal reference number</b>	ANON-AQTS-32U8-B - Historic England
<b>Full reference number</b>	
<b>Legally compliant?</b>	
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	This page is headed Development and Re-use of Buildings, but the text does not really cover that. Should the heading change, or (and this is our preference) could additional text be added on the contribution made by the re-use of buildings? This could also help to signpost to the heritage section of the plan, acknowledging that a fabric first approach is NOT appropriate for traditionally constructed buildings. We would be happy to comment on any additional text if needed.
<b>What is your suggested wording or text for the policy?</b>	We encourage adding text that recognises the contribution that heritage can make to climate change mitigation and adaptation. This includes support for building retention, repair and reuse and the sensitive adaptation of traditionally constructed buildings to improve their carbon and energy efficiency. This would help to support the opening of policy CN1. We would be happy to liaise further on suitable text if needed.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Email correspondence (between officers and Historic England)</a> <a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a>

<i>images, tables, or tracked changes, if applicable.</i>	
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<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/24/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan's strategy. Given the challenges we face, there is no other option than to address these head on. Of course, future practice needs to match the good intentions, but whenever there is a perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. The Parish Council supports these policies. Support policies CN1-8 inclusive.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies)</a>

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/35/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The council has a carbon neutral plan, which is essential for the country. The Local plan is designed to meet these requirements (section 4.5). This is much more important than the government's proposed slash and burn approach to housing development.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No



<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Peter Duff
<b>Personal reference number</b>	ANON-AQTS-3BB7-7
<b>Full reference number</b>	ANON-AQTS-3BB7-7/1/CN1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>How democracy dies! I find your approach here so dishonest. You're trying to make difficult for people to put critical views. The proposed development fails on all counts, biodiversity, landscape, green space, wilderness area, carbon footprint etc. That is obvious, you know that, so why are you even considering the plan? You're trying to shoehorn correspondents into irrelevantly agreeing or disagreeing with what very narrow specifics of your plan you define as "legally compliant" or "sound", whatever that means. You're simply trying to bamboozle people into talking about an agenda set up by you to push through this environmentally and aesthetically destructive nonsense. Yes, I'm sure the laws and guidance have been put in place for you to basically do what you want and mask any environmental degradation (and this is a huge example) and increased carbon footprint (which will also be massive in the building stage and subsequent transport into Winchester), behind legalese, "guidance" and "plans". I haven't noticed your opposition to any of this. And let's not forget that this proposed eyesore of a development will also entail putting traffic lights onto one of the main arteries, probably the main artery, of Winchester's highways. This road so far does not have traffic lights or major junctions down most of its stretch. Can you tell me of the carbon footprint caused by stopping the traffic to allow perhaps only one vehicle to exit the site.</p> <p>And what's it all for? Extra accommodation for students that is a large distance of hilly walks from their place of study, so they'll all be bussed around most of the time, and some sort of speculative business which could easily and more cheaply go somewhere else. None of it makes much sense, and I think the driving reason is that the Church of England wants to make some money.</p> <p>Let us also remember that near 3/4 of a million net immigration last year alone, which even the OBN is now admitting are nearly all going to cost the treasury money over their lifetimes rather than contributing. Where is your opposition to all this?</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Just say no. I'm not a lawyer, so stop treating general correspondents as such.

<b>What is your suggested wording or text for the policy?</b>	Refuse it. The inspector, as with a certain John Braithwaite at the charade of the Pitt Manor enquiry 12 years ago, will be most likely to sign it off. It must not be allowed to get to that stage.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Winchester Action on the Climate Crisis (WinACC)
<b>Personal reference number</b>	ANON-AQTS-3B4K-D
<b>Full reference number</b>	ANON-AQTS-3B4K-D/4/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	WinACC supports this policy
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Foreman Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3291-8
<b>Full reference number</b>	ANON-AQTS-3291-8/3/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>FH support the Local Plan in contributing to the Council's declaration of a climate emergency and mitigating the impacts of climate change. As such we support the policy in principle. However, as drafted, the policy engages all development except householder and change of use. Not all criteria are relevant to all other types and scale of development. The policy does not identify how any failure to demonstrate one of the criteria, or how the delivery of a neutral position, will be reacted to by a decision-maker.</p> <p>While an Energy and Carbon Statement must be 'proportionate' clearer guidance will be required to explain what level of information will be required to judge any conflict with CN1. The further details and checklist referred to on page 38 have not yet been published. FH particularly object to bullet point ii, which is overly burdensome by introducing a sequential approach to the rationale for the land use / site as a matter of principle. This is not sound as it is inconsistent with national policy.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>FH support the Local Plan in contributing to the Council's declaration of a climate emergency and mitigating the impacts of climate change. As such we support the policy in principle. However, as drafted, the policy engages all development except householder and change of use. Not all criteria are relevant to all other types and scale of development. The policy does not identify how any failure to demonstrate one of the criteria, or how the delivery of a neutral position, will be reacted to by a decision-maker.</p> <p>While an Energy and Carbon Statement must be 'proportionate' clearer guidance will be required to explain what level of information will be required to judge any conflict with CN1. The further details and checklist referred to on page 38 have not yet been published. FH particularly object to bullet point ii, which is overly burdensome by introducing a sequential approach to the rationale for the land use / site as a matter of principle. This is not sound as it is inconsistent with national policy.</p>
<b>What is your suggested wording or text for the policy?</b>	<p>FH support the Local Plan in contributing to the Council's declaration of a climate emergency and mitigating the impacts of climate change. As such we support the policy in principle. However, as drafted, the policy engages all development except householder and change of use. Not all criteria are relevant to all other types and scale of development. The policy does not identify how any failure to demonstrate one of the criteria, or how the delivery of a neutral position, will be reacted to by a decision-maker.</p> <p>While an Energy and Carbon Statement must be 'proportionate' clearer guidance will be required to explain what level of information will be required to judge any conflict with CN1. The further details and checklist</p>

	referred to on page 38 have not yet been published. FH particularly object to bullet point ii, which is overly burdensome by introducing a sequential approach to the rationale for the land use / site as a matter of principle. This is not sound as it is inconsistent with national policy.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on Policies and Evidence Base - includes tables)</a> <a href="#">Supporting document 1 (Letter re: SHELAA site CU08)</a> <a href="#">Supporting document 2 (Location Plan)</a> <a href="#">Supporting document 3 (Concept Plan)</a> <a href="#">Supporting document 4 (Illustrative masterplan)</a> <a href="#">Supporting document 5 (Access and Transport Report)</a> <a href="#">Supporting document 6 (Landscape and visual study)</a> <a href="#">Supporting document 7 (Flood Risk Assessment &amp; Conceptual Drainage Strategy)</a> <a href="#">Supporting document 8 (Interim Ecology Assessment)</a> <a href="#">Supporting document 9 (Biodiversity Net Gain Feasibility Report)</a> <a href="#">Supporting document 10 (Statutory Biodiversity Metric)</a> <a href="#">Supporting document 11 (Preliminary Noise and Vibration Summary)</a> <a href="#">Supporting document 12 (Vision Statement - Land at Station Hill, Botley)</a>

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/21/CN1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	CN1 - iv - This policy seems at odds with an allocation of housing in Colden Common (see policy SP2). Colden Common has no cycle routes - See representation on T1. Colden Common has a poor provision of transport - See representation on T1. Allocation of housing in Colden Common does not reduce car dependency and is does not align with the strategic policy "To minimise carbon emissions and ensuring climate change and adaption issues are embedded in the Local Plan".
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Mandy Owen (Boyer) on behalf of Vistry Partnerships
<b>Personal reference number</b>	ANON-AQTS-32GC-8
<b>Full reference number</b>	ANON-AQTS-32GC-8/5/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Vistry Partnerships is committed to the move to 'net zero' and supports Draft Policy CN1 in principle. It is welcomed that the policy sets out a design process through which development proposals can consider and incorporate varied forms of low carbon solutions. Additionally, it is welcomed that the policy recognises the role of broader green infrastructure provision (which is multifunctional in purpose) as contributing positively to avoiding and/or mitigating climate change effects. This will help to influence the masterplanning and design process, ensuring that sustainability measures are considered at an early stage and are holistically integrated.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	-
<b>What is your suggested wording or text for the policy?</b>	-
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes <a href="#">Letter (commenting on policies and evidence base - includes tables)</a> <a href="#">Supporting document 1 (Affordable Housing Statement)</a> <a href="#">Supporting document 2 (Vision Document 1 - Pitt Vale)</a> <a href="#">Supporting document 3 (Vision Document 2)</a> <a href="#">Supporting document 4 (Landscape and Visual Technical Note)</a> <a href="#">Supporting document 5 (Biodiversity Net Gain Feasibility Report)</a>



*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Mark Behrendt
<b>Personal reference number</b>	ANON-AQTS-32GG-C
<b>Full reference number</b>	ANON-AQTS-32GG-C/5/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	HBF do not consider the reference in part i to be consistent with the scope of local plans with regard to technical building standards. The WMS is clear that the focus should be on reducing carbon emissions rather than minimising energy consumption as is being proposed by the Council. More detailed comments on the HBF's position are set out in our response to Strategic Policy CN3.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (copy of form - refers to letter)</a> <a href="#">Letter (Commenting on policies and evidence base)</a>

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Martin Miller, tor&co Ltd (Formerly Terence O'Rourke Ltd)
<b>Personal reference number</b>	ANON-AQTS-32UM-Z
<b>Full reference number</b>	ANON-AQTS-32UM-Z/3/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Whilst Anchor Properties supports the ambition for development proposals to mitigate and adapt to climate change, as well as helping the district meet its targets contained within the Council's Climate Emergency Declaration, they do not fully support the approach set out in Policy CN1, which they do not consider to be effective. The provision of rainwater gardens is an admirable aspiration. However, there are significant spatial implications of such proposals and these would need to be considered alongside the views of Hampshire County Council as highways authority. Whilst the climate change and environmental goals of the plan are understandably ambitious given that the council has declared a climate change emergency, due consideration must be given to the viability implications of such policies, otherwise the plan will simply not facilitate delivery of the growth levels required during the plan period. The policy therefore needs to be preceded by the phrase "subject to viability considerations".</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	As set out above, the phrase " <b>subject to viability considerations</b> " should be added to the policy wording to ensure that developments have flexibility around these requirements where viability may be an issue to delivery.
<b>What is your suggested wording or text for the policy?</b>	'...In order to mitigate against climate change, development proposals (excluding household extensions and changes of use) will need to demonstrate through the design process, <b>subject to viability considerations</b> , that: ...'
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	No

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Catesby Estates
<b>Personal reference number</b>	ANON-AQTS-32NS-Y
<b>Full reference number</b>	ANON-AQTS-32NS-Y/4/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Catesby is committed to the move to 'net zero carbon' and supports Draft Policy CN1 in principle. It is welcomed that the policy recognises the role of broader green infrastructure provision (which is multifunctional in purpose) in contributing positively to avoiding and mitigating climate change effects. This will help influence the masterplanning and design process, ensuring that sustainability measures are considered early (in the design process) and holistically integrated.</p> <p>Catesby is concerned that the Draft Local Plan proposes energy efficiency standards that may increase build costs to the point that some developments may become unviable or risk not being able to provide policy-compliant levels of affordable housing. Indeed, if cumulative impacts on development viability are underestimated (as appears to be the case), this could undermine the overall effectiveness of the Local Plan. A particular concern is that the Viability Assessment, summarising at paragraphs 4.22 to 4.23 of that report, does not provide detailed consideration of the specific cost implications of the uplifted standards envisaged in the Plan. Rather, it states that "...it is now well documented that the cost to achieve net zero operational carbon standards will reduce over time and the same is expected to be true of other extra over costs relating to recently increased standards. The above affordable housing indications assume this approach as a baseline. "There is also another emerging dimension to zero carbon construction in relation to a potential positive impact on sales values. Anecdotal indications suggest there may be some potential values uplift or premium attached to zero carbon homes, certainty in the context of desirability owing to lower running costs. However, this is difficult to weigh up in the broader viability context with confidence."</p> <p>This level of analysis is high level, anecdotal, and uncertain, and does not demonstrate that the uplifted requirements are viable. It is recognised that the Viability Assessment draws on the conclusions of the Net Zero Carbon Targets – Evidence Base Report (2022, as updated in 2023), as produced by Elementa. This report confirms cost assumptions at Q2 2022, which the document acknowledges are subject to a wide range of caveats. These cost assumptions (which were always uncertain) have become outdated in view of the coinciding period of inflationary pressure, and particularly high levels of inflation in construction costs. It</p>

	cannot then be said that the 5.4% uplift in costs over Building Regulations (as identified in Section 7 of that report) reflects a reasonable assumption at the point of the Plan's intended adoption in 2025. Accordingly, Policy CN1 is not justified or effective at this stage.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The Policy wording may not need to be revised. However, the Viability Assessment should fully capture all resultant increases in build costs.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document 1 (Location Plan - Land off Titchfield Lane, Wickham)</a> <a href="#">Supporting document 2 (Vision Framework)</a> <a href="#">Supporting document 3 (Concept Plan)</a> <a href="#">Supporting document 4 (Integrated Impact Assessment comments)</a>

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	West Waterlooville Developments Limited (Grainger PLC)
<b>Personal reference number</b>	ANON-AQTS-3B5G-A
<b>Full reference number</b>	ANON-AQTS-3B5G-A/3/CN1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>West Waterlooville Developments Limited (WWDL) supports the principle of moving towards a carbon zero future and recognises the legal duty the Local Planning Authority have in meeting the requirements of the Climate Change Act 2008 by ensuring the Local Plan including policies designed to mitigate and adapt to Climate Change.</p> <p>Representations made by the HBF in regarding to policies CN1 - CN8 regarding the importance of ensuring consistency and compatibility with requirements set by national planning policy requirements and the WMS published on 13th December 2023 are supported by WWDL. WWDL consider that the proposed approach should be in accordance with the NPPF as required by the written ministerial statement published on the 13th of December 2023 and High Court judgement from the 2nd of July 2024 ([2024]EWHC 1693 Admin). WWDL refer WCC to the existing national approach, the Future Homes Standard which is currently being taken forward to achieve the same goal, and suggest the LPA should adopt this approach.</p> <p>The application of the LETI standards by way of the policies identified in CN1 – CN8 may raise challenges with the implementation of extant outline planning consents, if, the application of the policy requirements impact the deliverability of the planned for development. This in turn may have implications on the delivery of dwellings on schemes for which the parameters, provision of open space, layout and density has already been set. Whilst WWDL encourages the above points to be addressed and the detail of the HBF representations to be considered in full, it is recommended that, at the least, the suite of policies designed to assist the Council in meeting its net zero target by 2040 (CN1-8) should be worded so as to allow for an element of flexibility in their application where sufficient evidence has been provided to demonstrate that full compliance can not be achieved. Such flexibility could be demonstrated in the Energy and Carbon Statement required by way of policy CN1, with additional worded added to the requirements of this statement to allow for negotiation with the Council on what is achievable.</p>
<b>What modification(s) are necessary to make the</b>	Policies CN1 - CN8 should be reviewed with developers required to address national climate commitments through Future Homes Standards.

<b>policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	Should policy CN1 be retained, it is recommended that additional flexibility is included within the policy's wording to allow developers to negotiate on compliance with the full suite of policies. This could be incorporated into the requirement to agree on an Energy and Carbon Statement with each application.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting Document (Site Delivery Statement - Berewood)</a>



<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Ed Flood (Agent on behalf of Sparsholt College)
<b>Personal reference number</b>	ANON-AQTS-32NR-X
<b>Full reference number</b>	ANON-AQTS-32NR-X/6/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The College supports Draft Policy CN1 in-principle and it is noted that the Government has now decided to allow Local Planning Authorities to set energy efficiency requirements above those set out in Building Regulations. However, there remains some concern that the draft Local Plan proposes energy efficiency / building sustainability targets that (cumulatively) may increase build costs to the point that developments may become unviable. Please see the college's representation to draft Policy CN3 for greater detail in respect of BREEAM targets. In the context of the current inflationary and recessionary environment, the cumulative impacts of all policies that impact build costs require careful scrutiny. Indeed, should impacts on development viability be underestimated, this could in-turn undermine the effectiveness of the Local Plan as a whole (as a key test of soundness).
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We would recommend the proposed policies within the Draft Local Plan also align with the emerging updates to Part L of the Building Regulations to ensure an appropriate target trajectory which can be realistically achieved.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	No

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/15/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised</b></p> <p>Bloor Homes supports in principle the ambition for development proposals to mitigate and adapt to climate change, as well as helping the district meet its targets contained within the Council's Climate Emergency Declaration. The application of this policy must be proportionate and take into account site-specific considerations. It should be recognised that it may not be possible for all of the criteria to be met on each site. For example, there are significant spatial implications arising from the provision of rainwater gardens, including next to roads and footways. This needs to be considered alongside the views of HCC as highways authority as well as the potential implications for viability, long-term future maintenance and design considerations. Requiring developments to provide open space for people to grow their own food is also admirable, but consideration needs to be given to how such space would be managed and maintained, unless as a traditional allotment, and the impacts that such areas would have for developers who are already struggling to meet stringent nutrient neutrality requirements. Increasing green infrastructure requirements could have a detrimental impact on the quantum of homes a site can deliver and lead to the inefficient use of sustainably located sites, particularly smaller sites. Such provision may be more appropriate in some locations than others. There would equally need to be demand from new residents for such facilities which simply won't be known at the plan-making or even necessarily at the planning application stage of the development process.</p> <p>In applying criteria xi and xii, which Bloor Homes does not object to in principle, the Council must ensure that such requirements are looked at in the round in order to ensure that proposals are designed to fit their site context. In some cases, it may be more appropriate to design buildings in a different orientation, for example, where a focal building is required to face a key space or access arrangement. Bloor Homes does not object to the principle of the addition of criteria xiv, it should be recognised that the use of green roofs and walls will not be appropriate in many instances and will add additional cost to development, which must already address a wide range of requirements. Whilst the climate change and environmental goals of the plan are</p>

	<p>understandably ambitious given that the council has declared a climate change and nature emergency, due consideration must be given to the viability implications of such policies, otherwise the plan will simply not facilitate delivery of the growth levels required during the plan period.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Bloor Homes supports in principle the ambition for development proposals to mitigate and adapt to climate change, as well as helping the district meet its targets contained within the Council’s Climate Emergency Declaration. The application of this policy must be proportionate and take into account site-specific considerations. It should be recognised that it may not be possible for all of the criteria to be met on each site. For example, there are significant spatial implications arising from the provision of rainwater gardens, including next to roads and footways. This needs to be considered alongside the views of HCC as highways authority as well as the potential implications for viability, long-term future maintenance and design considerations. Requiring developments to provide open space for people to grow their own food is also admirable, but consideration needs to be given to how such space would be managed and maintained, unless as a traditional allotment, and the impacts that such areas would have for developers who are already struggling to meet stringent nutrient neutrality requirements. Increasing green infrastructure requirements could have a detrimental impact on the quantum of homes a site can deliver and lead to the inefficient use of sustainably located sites, particularly smaller sites. Such provision may be more appropriate in some locations than others. There would equally need to be demand from new residents for such facilities which simply won’t be known at the plan-making or even necessarily at the planning application stage of the development process.</p> <p>In applying criteria xi and xii, which Bloor Homes does not object to in principle, the Council must ensure that such requirements are looked at in the round in order to ensure that proposals are designed to fit their site context. In some cases, it may be more appropriate to design buildings in a different orientation, for example, where a focal building is required to face a key space or access arrangement. Bloor Homes does not object to the principle of the addition of criteria xiv, it should be recognised that the use of green roofs and walls will not be appropriate in many instances and will add additional cost to development, which must already address a wide range of requirements. Whilst the climate change and environmental goals of the plan are understandably ambitious given that the council has declared a climate change and nature emergency, due consideration must be given to the viability implications of such policies, otherwise the plan will simply not facilitate delivery of the growth levels required during the plan period.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Bloor Homes supports in principle the ambition for development proposals to mitigate and adapt to climate change, as well as helping the district meet its targets contained within the Council’s Climate Emergency Declaration. The application of this policy must be proportionate and take into account site-specific considerations. It should be recognised that it may not be possible for all of the criteria to be met on each site. For example, there are significant spatial implications arising from the provision of rainwater gardens, including next to roads and footways. This needs to be considered alongside the views of HCC as highways</p>

	<p>authority as well as the potential implications for viability, long-term future maintenance and design considerations. Requiring developments to provide open space for people to grow their own food is also admirable, but consideration needs to be given to how such space would be managed and maintained, unless as a traditional allotment, and the impacts that such areas would have for developers who are already struggling to meet stringent nutrient neutrality requirements. Increasing green infrastructure requirements could have a detrimental impact on the quantum of homes a site can deliver and lead to the inefficient use of sustainably located sites, particularly smaller sites. Such provision may be more appropriate in some locations than others. There would equally need to be demand from new residents for such facilities which simply won't be known at the plan-making or even necessarily at the planning application stage of the development process.</p> <p>In applying criteria xi and xii, which Bloor Homes does not object to in principle, the Council must ensure that such requirements are looked at in the round in order to ensure that proposals are designed to fit their site context. In some cases, it may be more appropriate to design buildings in a different orientation, for example, where a focal building is required to face a key space or access arrangement. Bloor Homes does not object to the principle of the addition of criteria xiv, it should be recognised that the use of green roofs and walls will not be appropriate in many instances and will add additional cost to development, which must already address a wide range of requirements. Whilst the climate change and environmental goals of the plan are understandably ambitious given that the council has declared a climate change and nature emergency, due consideration must be given to the viability implications of such policies, otherwise the plan will simply not facilitate delivery of the growth levels required during the plan period.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map and evidence base)</a>  <a href="#">Vision document (Land At Mill Lane, Wickham)</a></p>

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Crest Nicholson Partnerships and Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32UU-8
<b>Full reference number</b>	ANON-AQTS-32UU-8/3/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response – for track changes please see submission.</b></p> <p>Crest Nicholson is committed to tackling the challenges of climate change and acknowledges the important role the development industry has to play in the national transition to a low and zero carbon society. Supports the overarching aims of Strategic Policy CN1 to mitigate and adapt to the impacts of climate change, and of the Council aspiring to become a carbon neutral authority. However, questions the construction of the policy and the assignment of obligations, notably in respect of criterion (ii), which implies that spatial considerations relating to the identification of sites are the responsibility of developers/applicants, when such matters should properly fall to the plan-making process, and should be the building blocks of any comprehensive policy framework. This policy should therefore be reworded as it is not consistent with the Framework; specifically Paragraph 16 which states that policies should be ‘clearly written and unambiguous’.</p> <p>As is stated within our representations to Policy SP2, the most effective response to tackling the climate emergency the Council has declared is via the promulgation of a spatial strategy that focuses development at scale in the most sustainable locations, in close proximity to day-to-day services and facilities so that motorised travel demand is reduced. The importance of planning at scale, a policy response pursued successfully in the adopted Local Plan through the MDA allocations, is evidenced by the propensity for such sites to include the provision of local centres and facilities that can meet the needs of the resident population and therefore support self-containment and foster the creation of 15/20-minute neighbourhoods. The North Whiteley MDA is a highly successful example of this policy approach and the decision to allocate further land to maximise the potential of the allocation is supported fully. The allocation of further land at the North Whiteley MDA is a positive policy measure that is rightly driven by the objective of curtailing travel demand and promotion of highly accessible places as the foci for development.</p>
<b>What modification(s) are necessary to make the</b>	Amendment to criterion ii. Criterion (ii) is not clearly written and unambiguous and should therefore be amended as follow:

<p><b>policy legally compliant or sound?</b></p>	<p>“It has been demonstrated that as part of the design process, how site layout and the orientation, fabric glazing ratio and the choice of construction materials for the buildings proposed have been designed to minimise energy demand;”</p> <p>Reference to Policy CN3 in Criterion (i) should also be deleted (see our separate representations on this policy).</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Criterion (ii) is not clearly written and unambiguous and should therefore be amended as follow:          “It has been demonstrated that as part of the design process, how site layout and the orientation, fabric glazing ratio and the choice of construction materials for the buildings proposed have been designed to minimise energy demand;”</p> <p>Reference to Policy CN3 in Criterion (i) should also be deleted (see our separate representations on this policy).</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Supporting document 3 (Policy CN1 comments)</a></p>



<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Church Commissioners for England
<b>Personal reference number</b>	ANON-AQTS-32U5-8
<b>Full reference number</b>	ANON-AQTS-32U5-8/3/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The aspirations set out within this policy are generally supported. However, the policy should be clear on what details the Energy and Carbon Statement will need to cover. As drafted, it is not clear practically how the Statement could be effectively updated through a phased development. Baseline circumstances are factored into the beginning of development phases and will typically inform the viability of development. The draft policy should reflect that.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We would therefore suggest reference to “the up to date baseline circumstances” is removed from the policy wording. This element of the policy would then read “In the case of a phased development, the Energy and Carbon Statement will need to be updated at each phase to reflect any new or emerging opportunities.”
<b>What is your suggested wording or text for the policy?</b>	We note that additional wording has been included in Policy CN1 in this latest version of the plan. Generally, we support this revised wording, however we consider the following amendments to the criteria should be made: iii Nature-based solutions have been investigated and incorporated into the development where practical, that deliver multifunctional benefits for health and well-being, biodiversity net gain, natural flood management, air and water quality; xv As a last resort, a mechanical air conditioning system could be installed in a building (ensuring this uses the lowest source of carbon emissions practical).
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	No

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/7/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW. Bloor is supportive of Strategic Policy CN1 Mitigating and Adapting to Climate Change which contains a well considered route to reducing emissions from homes and provides flexibility in approaches to design development and development scale at suitable criteria. For example, Adapting to Climate Change criteria ix. water use management and conservation and the concluding paragraph which refers to the requirement for an Energy and Carbon Statement, which is proportionate to the nature of application, to demonstrate how the design process has addressed the Policy CN1 requirements.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes <a href="#">Letter (commenting on Policies &amp; Evidence Base)</a> <a href="#">Supporting document 1 (South Winchester Vision Document)</a> <a href="#">Supporting document 2 (Response to the delivery of housing)</a> <a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a> <a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a>

*However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Supporting document 5 \(Statement of Common Ground between Bloor Homes & Stagecoach \(South\) Ltd\)](#)

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/15/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	As the statutory water and wastewater undertaker to parts of Winchester District, Southern Water supports criterion ix of this policy which relates to water use management and conservation. There are additional benefits to minimising water use in terms of reduced carbon emissions from treating, supplying, and heating water, as well as lower water and energy bills for future occupants. In addition to conserving water resources, measures such as rainwater harvesting, greywater recycling, SuDS and rain gardens can all contribute to helping reduce pressure on drainage networks by ensuring surface water from new development is kept out of foul or combined sewers.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes <a href="#">Supporting Document (Commenting on policies)</a>

*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Tony Clements
<b>Personal reference number</b>	ANON-AQTS-3BX4-T
<b>Full reference number</b>	ANON-AQTS-3BX4-T/5/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Vistry and Taylor Wimpey are committed to tackling the challenges of climate change and acknowledge the important role the development industry has to play in the national transition to a low and zero carbon society. While support is expressed for the overarching aims of Strategic Policy CN1 that seek to mitigate and adapt to the impacts of climate change, and for the Council aspiring to become a carbon neutral authority, there are reservations. The principal response to tackling the causes of the Climate Emergency the Council has declared should be via a spatial strategy that focusses development at scale in the most sustainable locations, near day-to-day services and facilities so that motorised travel demand is reduced. As consistently highlighted within successive sets of representations, carbon emissions generated by transport are significantly higher locally than those arising from any other sector. A joined-up, sustainable, spatially coherent strategy should therefore underpin the Local Plan, with development at scale concentrated at Winchester Town where the greatest potential exists to promote active travel and to reduce travel demand. This is the most effective response to the declared climate emergency that the Council could pursue.</p> <p>Reference is made to paragraph 4.6 of the Local Plan. The Local Plan highlights the issue, it does not then focus purposefully on spatial planning matters that would have the greatest potential to make a difference via the planning system – the pursuit of spatial development policies that are focussed on reducing carbon emissions. The North Whiteley MDA is a highly successful example of this policy approach, and the adjoining Kings Barton MDA will create locally accessible facilities. The scale of the Whiteley MDA provides greater potential to create a wider range of services and facilities compared to Kings Barton. However, a decision to continue growth northwards incorporating the land to the north of Wellhouse Lane would create a cohesive neighbourhood of up to 4,000 dwellings. If the Sir John Moore barracks site is also, eventually, brought forward the critical mass of planned growth to the north of the city centre would be in the region of 5,000 dwellings, with appropriately scaled supporting infrastructure.</p>

	<p>The Council, within the Regulation 18 response paper, contends that the proposed allocations within the 2040 plan are the product of assessment with the focus on sustainable locations that have the greatest potential to support the use of public transport and sustainable modes. However, the Integrated Impact Assessment (IIA) suggests otherwise.</p> <p>Objectives 1 and 3 – Climate Change Mitigation and Climate Change Adaptation achieve the highest scores against the options that concentrate growth at Winchester/and or within large scale strategic allocations. If reference is then made to the evaluation sections that follow the assessment table, there is acknowledgement that ‘the most significant source of carbon emissions and air pollution in the district is from transport’ (para.4.29). The town also benefits from a higher number of bus stops than other settlements in the District as well as four park and ride sites, which allow for connections to the town centre and railway station. From Winchester Town there are direct train connections to a number of key locations.</p> <p>Reference is made to paragraph 4.30 and paragraph 4.31 of the IIA. Despite recognising all these positive spatial strategy attributes (para. 4.42) of the assessment somehow concludes that focussing growth where there is the greatest potential to reduce reliance on the private car could have adverse impacts by creating undue pressure on services, resulting in an uncertain effect. The assessment outcomes do not reflect the evidence and imply a likelihood of bias against a Winchester focus that is not objectively founded on the evidence. Policy CN1 should be set within the strategic context of a spatial policy framework that places the locational aspects of tackling climate change at its heart. There is not a suitably wide suite of allocations that are based on this principle: the reduction of carbon emissions driven by the objective of curtailing travel demand and promotion of highly accessible places as the foci for development.</p> <p>An MDA of the scale of Barton Farm/Kings Barton alongside the proposed W2 allocation at Sir John Moore Barracks would provide the bedrock for a spatially coherent development strategy with carbon reduction ambition at its heart. In the context of a far greater housing delivery requirement via the new standard methodology that will shortly be introduced, it is vitally important the Council swiftly embarks upon updating the proposed spatial development strategy via an immediate review of the 2040 Plan.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The spatial strategy of the 2040 plan, which is inextricably linked to the Council's objectives in respect of addressing climate change is flawed in this regard. The provisions of policies addressing climate change considerations will be ineffective and partial absent of a spatial development strategy that is founded on principles of carbon reduction relating to travel demand management. The evidential basis and founding principles for the Council's policies in this regard are unsound.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	



<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Supporting Document (Planning for South Hampshire)</a>

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Richard Doughty
<b>Personal reference number</b>	ANON-AQTS-32FT-R - New Alresford Town Council
<b>Full reference number</b>	ANON-AQTS-32FT-R - New Alresford Town Council/3/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We welcome the ambitions for mitigating and adapting to Climate Change in CN1 and energy hierarchy under CN2.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Judith Anne Polak
<b>Personal reference number</b>	ANON-AQTS-32TW-9
<b>Full reference number</b>	ANON-AQTS-32TW-9/3/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The requirement to design development mitigating climate change is impossible in rural areas where super-fast fibre broadband is limited or non-existent and sustainable travel virtually impossible due to limited public transport and non-existent employment opportunities. People have to drive to work to shop or into town for entertainment and leisure. This will increase carbon emissions. On line shopping is an option but this increases the number of larger vehicles on rural lanes and roads.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Hampshire Hospitals NHS Foundation Trust
<b>Personal reference number</b>	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust
<b>Full reference number</b>	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/7/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Trust remains fully supportive of the WCC objective to achieve carbon neutrality by 2030 and to encourage others to do the same. This continues to broadly align with the NHS net zero and HHFT Green Plan targets of 2040 and 2045. The Trust will continue to welcome direct engagement with the City Council, the University and other public sector bodies on collaborative projects. The Trust is committed to achieving Net Zero Carbon by 2040 and is keen to support WCC's aspiration for new developments to meet this standard across the metrics identified. Where staff (for example) are concerned, the Trust would welcome discussion and support from WCC to enable accessible and affordable travel and transport alternatives to car use, as the discounted parking at Park and Rides offered during covid. The Trust would be keen to support moves towards carbon zero healthy forms of onward travel from these hubs.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	-
<b>What is your suggested wording or text for the policy?</b>	-
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	No

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Phil Gagg
<b>Personal reference number</b>	ANON-AQTS-3B8M-K
<b>Full reference number</b>	ANON-AQTS-3B8M-K/6/CN1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy CN1 refers to the Winchester District Carbon Neutrality Action Plan (CNAP) and promotes its values and aims. However this section of the plan is not sound:</p> <ul style="list-style-type: none"> <li>• in that it is not positively prepared (it does not explicitly state what the target of the plan is – net zero emissions by 2030 – and does not therefore set out a strategy)</li> <li>• neither is it effective (it does not include transport emissions targets for development and does not therefore provide an effective framework for emissions reduction associated with development).</li> </ul> <p>Strategic Policy CN1 is introduced by “The plan will help to meet the targets in the council’s Climate Emergency Declaration and reduce the district’s carbon footprint by supporting the re-use and refurbishment of existing buildings where possible and ensuring that new development is designed in a way that adapts to challenges of climate change in a positive, comprehensive and integrated way.” The policy fails to include the target: the council has declared an aim to reach net zero emissions by 2030. This will not be reached unless the council takes every possible step. Since in 2022 transport emission were very close to half the emissions in the district, the top priority must be to tackle transport emissions.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Paras iv, and v of the policy and the introduction to these paragraphs leave far too much open to interpretation, as such this is inconsistent with the plan’s commitment to the Carbon Neutrality Action Plan. There needs to be a sustainable transport equivalent to the approach taken on building standards. The adoption of LETI energy standards in para 4.27 includes references to quantitative building standards and many specific standards are given. Such an approach on sustainable transport is more urgent than it is on building standards since transport emissions are far greater than building emissions standards.</p>
<b>What is your suggested wording or text for the policy?</b>	<p>In order to achieve proportionate carbon emissions reductions that will contribute to the council’s Carbon Neutrality Plan’s targets for emissions (net zero by 2030) development proposals (excluding household extensions and changes of use) will need to include in the design process:</p> <p>iv. Infrastructure for walking and cycling/wheeling fully incorporated into the layout, compliant with sustainable travel guidance issued by the council [to be written]. that prescribes the density of walking and</p>

	<p>cycling/wheeling infrastructure in route length per hectare for each active travel mode (at least 0.12 miles per hectare). In support of this they will need to include:</p> <ul style="list-style-type: none"> <li>• an outline plan of the required sustainable transport infrastructure based on LTN 1/20 demonstrating how pedestrians and cyclists will make use of this as default first choice to gain high quality non-motor-vehicle access to every part of the site;</li> <li>• where there is a gap in existing provision, plans for cycle and pedestrian routes outside the site that will link in with cycle and pedestrian routes across Winchester District compliant with the standards of LTN 1/20, .</li> <li>• a bus access plan that will facilitate easy access to all bus services running close to the site, and proposals for improving bus services in development site locations where bus services are insufficient to meet the daily transport requirements of residents, users and visitors to the site.</li> </ul> <p>v. Recharging points for sustainable modes of transport, incorporated early on in the design and build process (Policy T3) and provided in conveniently located positions that do not conflict with walking and cycling infrastructure within the development; in a timely way to benefit residents from the first occupation;</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>



<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Mary Goodwin
<b>Personal reference number</b>	BHLF-AQTS-32EK-E - Test Valley Borough Council
<b>Full reference number</b>	BHLF-AQTS-32EK-E - Test Valley Borough Council/4/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	TVBC also welcomes the strategic emphasis in the Plan on seeking carbon neutrality and adapting for future climate change over the plan period and beyond. The objectives and policies recognise the role that local plans can play in supporting wider ambitions to mitigate and adapt to climate change and set out a range of ways through which this can be achieved. TVBC has declared a climate emergency and the overarching theme of countering climate change runs throughout our draft Regulation 18 (Stage 2) Local Plan and policies.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Form (copy of form - refers to letter)</a> <a href="#">Letter (Commenting on policies)</a>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Shirlene Oh
<b>Personal reference number</b>	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust
<b>Full reference number</b>	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/7/CN1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Full response in letter.</p> <p>The Trust remains fully supportive of the WCC objective to achieve carbon neutrality by 2030 and to encourage others to do the same. This continues to broadly align with the NHS net zero and HHFT Green Plan targets of 2040 and 2045. The Trust will continue to welcome direct engagement with the City Council, the University and other public sector bodies on collaborative projects.</p> <p>The Trust is committed to achieving Net Zero Carbon by 2040 and is keen to support WCC's aspiration for new developments to meet this standard across the metrics identified. Where staff (for example) are concerned, the Trust would welcome discussion and support from WCC to enable accessible and affordable travel and transport alternatives to car use, as the discounted parking at Park and Rides offered during covid. The Trust would be keen to support moves towards carbon zero healthy forms of onward travel from these hubs.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b>	<p>Yes</p> <p><a href="#">Letter (Commenting on policies)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Ellen Satchwell
<b>Personal reference number</b>	BHLF-AQTS-3282-8 - Natural England
<b>Full reference number</b>	BHLF-AQTS-3282-8 - Natural England/8/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We note that this policy has been updated to include nature based solutions which is welcome. However, the policy could be strengthened through the inclusion of specific actions and targets for delivery of nature based solutions. Similarly we note that this policy is also not referenced in the Local Plan Monitoring Framework with no requirement for reporting. Specific targets and monitoring will make the policy much more likely to deliver tangible outcomes.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (Commenting on policies and evidence base)</a> <a href="#">Email correspondence (between Officers and NE re: compensatory habitats and SWBGS sites)</a> <a href="#">Form (commenting on Air Quality only)</a>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/8/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Wates notes that Strategic Policy CN1 is a 'gateway' policy which is supported by later Development Management style (non-strategic) policies of the draft Local Plan. The approach of the Policy is generally sound, and it strikes the right balance between requiring planning applications to demonstrate certain matters and encouraging higher standards where possible.</p> <p>The Council can, and should, support strategies which seek address climate change, and move away from fossil fuels towards innovative and renewable sources of power, but the influence of a Local Plan on such matters is limited to the local level. The challenge of the climate emergency and the need to reduce our carbon dependence is accepted by the Government.</p> <p>Chapter 14 in the NPPF sets the policy aim of transitioning to a low carbon future. To meet the 2050 target, new homes are already being built to higher energy efficiency standards set out in the 2021 Building Regulations which will deliver a 30% improvement on previous regulations. The policy runs the risk of becoming outdated as regulations, and national policy shifts, so its role must be kept under review. The Council will need to reflect its desire for partnership working, in this policy and use its agency to identify solutions to the challenges of climate change, and to support development opportunities where it can be demonstrated that climate change adaption and mitigation is being delivered.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on policies and evidence base)</a>



<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-3286-C
<b>Full reference number</b>	BHLF-AQTS-3286-C/8/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website.  Legally compliant Yes  Positively prepared Yes  Sound Yes  Justified Yes  Compliant with the duty to cooperate Yes  Effective Yes  Compliant with national policy Yes</p> <p>Wates notes that Strategic Policy CN1 is a 'gateway' policy which is supported by later Development Management style (non-strategic) policies of the draft Local Plan. The approach of the Policy is generally sound, and it strikes the right balance between requiring planning applications to demonstrate certain matters and encouraging higher standards where possible.</p> <p>The Council can, and should, support strategies which seek address climate change, and move away from fossil fuels towards innovative and renewable sources of power, but the influence of a Local Plan on such matters is limited to the local level. The challenge of the climate emergency and the need to reduce our carbon dependence is accepted by the Government. Chapter 14 in the Framework sets the policy aim of transitioning to a low carbon future. To meet the 2050 target, new homes are already being built to higher energy efficiency standards set out in the 2021 Building Regulations which will deliver a 30% improvement on previous regulations.</p> <p>The policy runs the risk of becoming outdated as regulations, and national policy shifts, so its role must be kept under review. The Council will need to reflect its desire for partnership working, in this policy and use its agency to identify solutions to the challenges of climate change, and to support development opportunities where it can be demonstrated that climate change adaption and mitigation is being delivered.</p>

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (Commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-328G-W
<b>Full reference number</b>	BHLF-AQTS-328G-W/8/CN1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website.  Legally compliant Yes  Positively prepared Yes  Sound Yes  Justified Yes  Compliant with the duty to cooperate Yes  Effective Yes  Compliant with national policy Yes</p> <p>Wates notes that Strategic Policy CN1 is a 'gateway' policy which is supported by later Development Management style (non-strategic) policies of the draft Local Plan. The approach of the Policy is generally sound, and it strikes the right balance between requiring planning applications to demonstrate certain matters and encouraging higher standards where possible.</p> <p>The Council can, and should, support strategies which seek address climate change, and move away from fossil fuels towards innovative and renewable sources of power, but the influence of a Local Plan on such matters is limited to the local level. The challenge of the climate emergency and the need to reduce our carbon dependence is accepted by the Government. Chapter 14 in the NPPF sets the policy aim of transitioning to a low carbon future. To meet the 2050 target, new homes are already being built to higher energy efficiency standards set out in the 2021 Building Regulations which will deliver a 30% improvement on previous regulations.</p> <p>The policy runs the risk of becoming outdated as regulations, and national policy shifts, so its role must be kept under review. The Council will need to reflect its desire for partnership working, in this policy and use its agency to identify solutions to the challenges of climate change, and to support development opportunities where it can be demonstrated that climate change adaption and mitigation is being delivered.</p>

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (Commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Winchester College
<b>Personal reference number</b>	BHLF-AQTS-328K-1
<b>Full reference number</b>	BHLF-AQTS-328K-1/7/CN1
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Previous representation made by Winchester College – Regulation 18 consultation. Winchester College support the principle of the City Council's approach to adapting to climate change defined in Strategic Policy CN1. However, for clarification, the College requests that the wording of the policy distinguishes between new development and changes of use. WCC Officer Comments in relation to the Regulation 18 consultation - Support welcomed and comments noted. Recommended response: Amend the wording in the policy. In order to clarify this point the words change of use have been added after the words excluding household extensions). Whilst it is acknowledged and supported that under the sub-heading 'Mitigating against Climate Change' development proposals which involve 'change of use' have been excluded, this has not been applied to the 'adapting to climate change' part of the policy. Based on the Officers 'recommended response' it is assumed this is an oversight. For the avoidance of doubt, the College suggested that this policy is amended as follows (suggested additional text is underlined):</p> <p>In order to adapt to climate change, development proposals (excluding household extensions and changes of use) will need to demonstrate through the design process that: For clarity, Winchester College reiterates that development proposals which involve the change of use of an existing building would not be able to demonstrate that the design process has considered how the layout incorporates and connects multi-functional nature based solutions and areas of open space, tree planting and biodiversity net gain. Winchester College objects to the additional criterion that has been added to CN1 at this Regulation 19 consultation stage: '..The design process assesses and considers the use of green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters, and the use of colour of external materials that can all contribute towards overheating; and..' Policy CN1 should be amended to confirm that the above requirements do not apply to change of use. Where these buildings are listed, the issue is compounded as retrofitting solutions may have an adverse impact on the significance of the heritage asset or its setting. For clarity, Winchester College reiterates that development proposals which involve the change of use of an existing building would not be able to demonstrate that the design process has considered how the layout</p>

	incorporates and connects multi-functional nature based solutions and areas of open space, tree planting and biodiversity net gain. Winchester College objects to the additional criterion that has been added to CN1 at this Regulation 19 consultation stage: ‘..The design process assesses and considers the use of green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters, and the use of colour of external materials that can all contribute towards overheating; and..’ Policy CN1 should be amended to confirm that the above requirements do not apply to change of use. Where these buildings are listed, the issue is compounded as retrofitting solutions may have an adverse impact on the significance of the heritage asset or its setting.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Policy CN1 should be amended to confirm that the above requirements do not apply to change of use. Where these buildings are listed, the issue is compounded as retrofitting solutions may have an adverse impact on the significance of the heritage asset or its setting.
<b>What is your suggested wording or text for the policy?</b>	The College suggested that this policy is amended as (suggested additional text is Underlined in the full response below): Adapting to Climate Change In order to adapt to climate change, development proposals (excluding household extensions and changes of use) will need to demonstrate through the design process that: Winchester College objects to the additional criterion that has been added to CN1 at this Regulation 19 consultation stage:‘..The design process (excluding change of use) assesses and considers the use of green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters,and the use of colour of external materials that can all contribute towards overheating; and..’
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (commenting on policies)</a> <a href="#">Supporting information (Map - Blackbridge Yard)</a>

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Harding Holding Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QY-8
<b>Full reference number</b>	BHLF-AQTS-32QY-8/5/CN1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Harding Holding supports the principles and specific criteria set out in this policy to avoid, minimise and mitigate developments carbon consumption and ultimately their environmental footprint. The Policy provides flexibility for further statutory requirements in relation to climate change, such a change in building control legislation.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies and evidence base)</a> <a href="#">Supporting information (Map)</a>

<b>Policy/Evidence base document</b>	CN1
<b>Name of respondent (or client)</b>	Lorna Selby
<b>Personal reference number</b>	BHLF-AQTS-32QQ-Z
<b>Full reference number</b>	BHLF-AQTS-32QQ-Z/5/CN1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Welcome and support the goals and inclusion of Strategy Policy CN1 which discusses important strategies to tackle overheating and water stress in the district as a result of the contemporary climate crisis. Increasing tree cover will be vital for achieving the Council's ambition to reach a net gain in tree canopy cover, as outlined in the Winchester City Council Tree Strategy (2022). Likewise, urban tree coverage will be vital for delivering key ecosystem services, such as enhancing local climate resilience through helping to mitigate extreme heat. For the policy to deliver in line with the Council's vision and legal objectives, we recommend its ambition is increased in line with wider best practise, guidance and policies.</p> <p>Seeking to maximise the ecosystem services delivered by trees and green infrastructure is essential for meeting legal air quality targets under the Environment Act, obligations and national policy direction to consider climate adaptation in planning and aligning with the key missions and associated obligations under the Levelling Up and Regeneration Act 2023 - notably the missions to improve local health outcomes and pride of place. Research, notably from Wycombe, has indicated a good level of ecosystem services is likely to be delivered at 25% canopy cover. Testing shows that it should be possible for developments of around 35% (dependent upon development form).</p> <p>The CABI publication 'What makes an eco-town?' suggested canopy cover of at least 25% in residential areas in order to deliver the associated ecosystem service benefits.<sup>6</sup> We therefore recommend that Strategy Policy CN1 is amended to follow best practice and require 25% tree canopy coverage. Likewise the requirement to replace lost trees at a ratio of 1:1 should be increased to 1:2, in order to mitigate against net loss from sapling die off. Compliance with best practise guidance and assessment procedure, should also be integrated, including British Standard 5837:2012 Trees – in relation to design, demolition and construction (or subsequent revisions), with the use of buffers which exclude damaging activity or other suitable protective measures. The Council should require a tree survey and an Arboricultural Impact Assessment (AIA) to be submitted. Where special techniques and tree protection methods will be necessary for successful</p>



	<p>implementation, details of them must also be included in the form of a Tree Protection Plan (TPP) and Arboricultural Method Statement (AMS). Further supplementary planning documents and guidance should seek to maximise the multifunctional benefits of tree planting, including for nature recovery, drawing on relevant species and planting guidance.</p> <p>Welcome the inclusion of overheating within Strategic Policy CN1: Mitigating and Adapting to Climate Change and the requirement for developers to submit an Energy and Carbon Statement to show the incorporation of thermal comfort in the design process. Likewise, we welcome referral to the Chartered Institution of Building Services Engineers publication ‘Design Methodology for the Assessment of overheating risk in Homes’ as guidance on overheating measures at the outset of the design. Strategic Policy CN1 is successful recognising the cooling hierarchy, which recommends the use of green roofs and external shutters to mitigate overheating, with mechanical air conditioning as a last resort.</p> <p>Recommend that this policy should be amended to specify that datasets must be used to ensure that all new development are designed for the climate they will experience over their design life and future climate scenarios, not just present conditions. Part O of building regulations, referenced in the preamble, only requires current climate scenarios be used (in the dynamic method), meaning that buildings are not being properly assessed for their whole lifespan, whereas London’s TM 49 weather data uses more up to date figures than TM 59.</p> <p>Most of England is already classified as seriously water stressed<sup>11</sup>, and as such, urgent action must be taken. We recommend that the Council amend the draft policy to 90 litres or less per person per day. We welcome the inclusion of rainwater recycling and greywater harvesting in Strategic Policy CN1: Mitigating and Adapting to Climate Change, which can be used to help achieve these strict water efficiency standards, alongside other strategies such as the introduction of mandatory water butts.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on policies)</a>

**WCC Response.**

Comments noted.

[The Carbon Neutrality and Embodied Carbon Topic Paper](#) has been updated (November 2024) that outlines the justification for Policy CN1 and the different ways that energy efficiency standards can be expressed.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed Modifications](#) agreed with Historic England: Addition of new criterion between criterion vii and viii on page 33.

Local Plan Reference or document	Policy CN2 Energy Hierarchy	
Total Number of Representations received.	17	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	15	1
Sound	6	10
Complies with Duty to Cooperate	15	1
<p><b>Summary of Representations</b></p> <p>There was a strong focus of Policy CN2 on energy efficiency and the implementation of renewable energy sources. There was widespread support for a ‘fabric first approach’, emphasising the importance of reducing energy demand through enhanced building design, but also a call for clearer guidance to avoid confusion during implementation. Concerns were raised about policy clarity (35%) particularly between policies CN1 and CN2. The transition towards net zero was highlighted and the feasibility of achieving complete reliance on renewable sources due to current technological and infrastructure constraints. The need to maintain high quality design and address heritage issues whilst at the same time ensuring that there are no potential conflicts with energy-saving measures. Feasibility and financial viability were raised along with changes to policy, technology and economic changes. Public engagement and effectiveness of the policy were also raised as a concern. Overall, the feedback indicates a need for a balanced approach that considers aspirations of the policy against practical and financial realities.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/40/CN2</b>  ANON-AQTS-3BSY-T/53/CN2  ANON-AQTS-3BB7-7/3/CN2  ANON-AQTS-3B4K-D/6/CN2</p> <p><b>ANON-AQTS-32CD-5 - Colden Common Parish Council/31/CN2</b>  ANON-AQTS-32GC-8/8/CN2  ANON-AQTS-32GG-C/8/CN2  ANON-AQTS-32NS-Y/6/CN2  ANON-AQTS-329Q-8/24/CN2</p> <p><b>ANON-AQTS-32U8-B - Historic England/4/CN2</b>  ANON-AQTS-3BQA-Z/14/CN2  ANON-AQTS-3BX4-T/8/CN2</p> <p><b>ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/13/CN2</b></p>		

**BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/13/CN2**

BHLF-AQTS-328X-E/12/CN2

BHLF-AQTS-3286-C/12/CN2

BHLF-AQTS-328G-W/12/CN2

**Main issues raised in representations received in regulation 19 consultation.**

- Support for the wording of Policy CN2 in terms of the 'fabric first approach';
- Concern about the clarity between Policy CN1 and CN2;
- Concern about the reliance on renewable sources due to current technological and infrastructure constraints; and
- Need to ensure that the need for renewable energy is balanced against the need for high quality design and heritage issues.

<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/40/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan's strategy. Given the challenges we face, there is no other option than to address these head on. Of course, future practice needs to match the good intentions, but whenever there is a perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. The Parish Council supports these policies. Support policies CN1-8 inclusive.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies)</a>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/53/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	See CN2. It is very important to maximise the re-use of developed land and use land as efficiently as possible.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No



<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Peter Duff
<b>Personal reference number</b>	ANON-AQTS-3BB7-7
<b>Full reference number</b>	ANON-AQTS-3BB7-7/3/CN2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>"Sustainable development" is an oxymoron. Every extra person that lives in the environs of Winchester will raise and keep raised the city's carbon footprint, and building houses or any other form of building, unless essential, will also increase the carbon footprint. So if you were really fussed about the "climate emergency" you would be calling loudly for the limiting or decrease in the UK's population.</p> <p>As you're obviously not, this questionnaire what I would regard as pointless window-dressing to flummox anyone who can spot an environmental disaster, both from the removal of wilderness (and it has evolved into wilderness) and replacement with car parks, buildings and vehicular access/egress that will be via a new traffic lit junction on one of the main arteries of the city. and it's too far from the University to make walking an attractive option most of the time. So they'll be bussed in and out.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	No

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Winchester Action on the Climate Crisis (WinACC)
<b>Personal reference number</b>	ANON-AQTS-3B4K-D
<b>Full reference number</b>	ANON-AQTS-3B4K-D/6/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	WinACC supports this policy
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/31/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	No comment but could not skip through this section
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Mandy Owen (Boyer) on behalf of Vistry Partnerships
<b>Personal reference number</b>	ANON-AQTS-32GC-8
<b>Full reference number</b>	ANON-AQTS-32GC-8/8/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Vistry Partnerships support the emphasis on the energy hierarchy and, through a fabric first approach, have designed their homes to require minimal energy demand. This will be achieved by having:</p> <ul style="list-style-type: none"> <li>• Wider cavities with high levels of insulation</li> <li>• Higher performing windows, doors and thermal bridging</li> <li>• Improved airtightness</li> <li>• Enhanced ventilation system to ensure adequate indoor air quality as homes get more airtight.</li> </ul> <p>However, fabric efficiency is only one way of reducing energy carbon emissions. The Government examined the potential for increased fabric efficiency as part of the Future Homes Standard and concluded that the 2021 standard is sufficient and that national climate commitments can be addressed through the Future Homes Standard which will see all homes being zero carbon ready from 2025. Vistry Partnerships remain committed to the forthcoming Future Homes Standards and is well advanced in its forward thinking to achieve these standards when they are enacted.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	-
<b>What is your suggested wording or text for the policy?</b>	-
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#"><u>Letter (commenting on policies and evidence base - includes tables)</u></a></p> <p><a href="#"><u>Supporting document 1 (Affordable Housing Statement)</u></a></p> <p><a href="#"><u>Supporting document 2 (Vision Document 1 - Pitt Vale)</u></a></p> <p><a href="#"><u>Supporting document 3 (Vision Document 2)</u></a></p> <p><a href="#"><u>Supporting document 4 (Landscape and Visual Technical Note)</u></a></p> <p><a href="#"><u>Supporting document 5 (Biodiversity Net Gain Feasibility Report)</u></a></p>
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<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Mark Behrendt
<b>Personal reference number</b>	ANON-AQTS-32GG-C
<b>Full reference number</b>	ANON-AQTS-32GG-C/8/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>HBF recognise that improving fabric efficiency can be play a part in reducing energy demand, however it must be recognised that it is not the only approach to securing reductions in carbon emissions. The Government have examined the potential for increased fabric efficiency as part of the Future Home Standard and concluded that the current 2021 standard is sufficient and that national climate commitments can be addressed through the Future Homes Standard which will see all homes being zero carbon ready from 2025.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Form (copy of form - refers to letter)</a> <a href="#">Letter (Commenting on policies and evidence base)</a>

*such as images, tables, or tracked changes, if applicable.*



<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Catesby Estates
<b>Personal reference number</b>	ANON-AQTS-32NS-Y
<b>Full reference number</b>	ANON-AQTS-32NS-Y/6/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Catesby supports the move towards net zero, and the development industry's support is vital to achieving this goal. Draft Policy CN3 sets out a range of standards that (in summary) prohibit using fossil fuels for heating or cooking and require that all new dwellings' energy requirements be met only from renewable generating sources.</p> <p>Catesby considers that Policy CN3 is working with the grain/direction of travel regarding national policy development. However, the operative point is (firstly) whether all of the requirements specified in this draft policy are capable of implementation when the Plan is adopted in 2025. In this respect, the policy wording anticipates that 100% of energy consumption (in new homes) will derive from renewable energy generation schemes, other than in exceptional and compelling circumstances.</p> <p>The evidence base does not indicate whether on-site renewable generation (equivalent to 100% of domestic energy usage) represents a realistic proposition at this point in time and can be achieved at scale. Without this understanding, it is subsequently unclear whether meeting 100% of domestic energy needs from renewable sources could be guaranteed until the wider UK power grid / UK power generation network is free from carbon-generating power stations. The 'Net Zero Carbon Targets' report (Elementa, September 2022), which forms part of the consultation evidence base, does not address this point.</p> <p>Notes that the envisaged space heating demand of (15 kWh/m<sup>2</sup>/year) effectively requires building fabric levels equivalent to Passivhaus (which appears to go beyond the requirements identified in draft Policy CN2). This is a particularly challenging standard to meet, given the shortage of skilled workers and material inputs in the UK, and the Passivhaus Planning Package (as referenced in paragraph 4.27 of the Plan, as supporting text to Policy CN3) is not easily applied to a housing scheme of significant scale.</p>

	<p>This is not to suggest that Policy CN3 is wrong to be ambitious. However, in seeking to move ahead of building regulations and to go beyond the Future Homes Standard, the onus is on the Council to demonstrate that what is envisaged is achievable and (importantly) achievable at scale, given the number of new homes that need to be delivered during the Plan-period. Catesby suggests that the standards specified in Policy CN3 should be phased in over the Plan-period to reflect the fact (acknowledged in the Elementa report) that technologies become more established and widespread over time. Put more simply, what is technically feasible and scalable in 2024/25 will differ from what is achievable in 2030 and 2040.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The Council should change the wording of this policy to require new homes to first become net zero carbon ready (as the decarbonisation of the national grid is not within the development industry's control) before requiring full net zero development at a later point within the Plan period. The Future Homes Standard, moving after that to applying more demanding standards, may provide a framework for this.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The Council should change the wording of this policy to require new homes to first become net zero carbon ready (as the decarbonisation of the national grid is not within the development industry's control) before requiring full net zero development at a later point within the Plan period. The Future Homes Standard, moving after that to applying more demanding standards, may provide a framework for this.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Supporting document 1 (Location Plan - Land off Titchfield Lane, Wickham)</a>  <a href="#">Supporting document 2 (Vision Framework)</a>  <a href="#">Supporting document 3 (Concept Plan)</a>  <a href="#">Supporting document 4 (Integrated Impact Assessment comments)</a></p>

<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/24/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>In line with our previous representations on the Regulation 18 Plan, Bloor Homes broadly supports the proposed energy hierarchy, and in particular the need to minimise energy demand by employing the ‘fabric first approach.’ However, it is essential to strike a balance between these aspirations and the practicalities of implementation and financial viability and therefore, Bloor Homes objects to this policy.</p> <p>In addition to the above, the policy needs to include more detail on what interventions should be considered at each stage of the hierarchy. As currently drafted, the policy does not include sufficient detail to enable applicants to understand what is required and as such is open to confusion and interpretation. Furthermore, there is little information set out in the support text which aids the reader to understand the Council’s requirements. Similarly, a review of the Carbon Neutrality and Embodied Carbon topic paper and evidence based topics does not assist.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>In line with our previous representations on the Regulation 18 Plan, Bloor Homes broadly supports the proposed energy hierarchy, and in particular the need to minimise energy demand by employing the ‘fabric first approach.’ However, it is essential to strike a balance between these aspirations and the practicalities of implementation and financial viability and therefore, Bloor Homes objects to this policy.</p> <p>In addition to the above, the policy needs to include more detail on what interventions should be considered at each stage of the hierarchy. As currently drafted, the policy does not include sufficient detail to enable applicants to understand what is required and as such is open to confusion and interpretation. Furthermore, there is little information set out in the support text which aids the reader to understand the Council’s requirements. Similarly, a review of the Carbon Neutrality and Embodied Carbon topic paper and evidence based topics does not assist.</p>
<b>What is your suggested wording or text for the policy?</b>	In line with our previous representations on the Regulation 18 Plan, Bloor Homes broadly supports the proposed energy hierarchy, and in particular the need to minimise energy demand by employing the ‘fabric first approach.’ However, it is essential to strike a balance between these aspirations and the practicalities of implementation and financial viability and therefore, Bloor Homes objects to this policy.

	<p>In addition to the above, the policy needs to include more detail on what interventions should be considered at each stage of the hierarchy. As currently drafted, the policy does not include sufficient detail to enable applicants to understand what is required and as such is open to confusion and interpretation. Furthermore, there is little information set out in the support text which aids the reader to understand the Council's requirements. Similarly, a review of the Carbon Neutrality and Embodied Carbon topic paper and evidence based topics does not assist.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map and evidence base)</a>  <a href="#">Vision document (Land At Mill Lane, Wickham)</a></p>

<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Guy Robinson
<b>Personal reference number</b>	ANON-AQTS-32U8-B - Historic England
<b>Full reference number</b>	ANON-AQTS-32U8-B - Historic England/4/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Without text highlighting that a fabric first approach is NOT appropriate for traditionally constructed buildings, we are concerned that this policy could result in maladaptation of historic buildings. The policy refers to all development, rather than new development. As such it could apply to the adaptation of existing buildings. This risks harm to heritage assets that would run counter to the plan's heritage policies and national policy. Also, should the "Minimise energy demand" point be formatted with a bullet?
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	<p>In the policy:</p> <p>"All development shall accord with the following energy hierarchy (in order of preference):</p> <ul style="list-style-type: none"> <li>• Minimise energy demand: for new build this is done by employing the 'fabric first approach';</li> <li>• Maximise energy efficiency;</li> <li>• Utilise renewable energy; and</li> <li>• Utilise low carbon energy." <p>In the supporting text: "Not only is the 'fabric first' approach the most sustainable and environmentally best approach for new build, but it can also make an important contribution to addressing fuel poverty and improving social equity. A fabric first approach is not appropriate for traditionally constructed buildings, as outlined in the text supporting policy HE14."</p> </li></ul>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Email correspondence (between officers and Historic England)</a> <a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a></p>
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<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/14/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Bloor is in agreement with Policy CN2 Energy Hierarchy, that energy consumption and carbon emissions reduction should be approached in a staged manner, represented by an energy hierarchy. However, it is considered that the policy should include more detail on what interventions should be considered at each stage. As currently written, the policy does not provide sufficient detail to avoid confusion in interpretation. Bloor therefore object to Policy CN2 until energy hierarchy is adopted. Broadly speaking, this should be as follows: Minimise energy demand by employing the ‘fabric first approach’;</p> <ul style="list-style-type: none"> <li>• Orientation</li> <li>• Façade glazing ratio</li> <li>• Insulation</li> <li>• Thermal bridging</li> <li>• Air tightness</li> </ul> <p>Maximise energy efficiency</p> <ul style="list-style-type: none"> <li>• Lighting efficiency</li> <li>• Ventilation efficiency</li> <li>• Heating/cooling efficiency</li> </ul> <p>Utilise renewable energy (onsite)</p> <ul style="list-style-type: none"> <li>• Onsite renewables (e.g. PV, heat networks)</li> <li>• Heat pumps for heating and hot water</li> </ul> <p>Utilise renewable energy (offsite)</p> <ul style="list-style-type: none"> <li>• Offsite renewables</li> </ul> <p>The proposed energy hierarchy categories should be rephrased to reflect this approach.</p>
<b>What modification(s) are necessary to make the</b>	PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.

<p><b>policy legally compliant or sound?</b></p>	<p>Bloor is in agreement with Policy CN2 Energy Hierarchy, that energy consumption and carbon emissions reduction should be approached in a staged manner, represented by an energy hierarchy. However, it is considered that the policy should include more detail on what interventions should be considered at each stage. As currently written, the policy does not provide sufficient detail to avoid confusion in interpretation. Bloor therefore object to Policy CN2 until energy hierarchy is adopted. Broadly speaking, this should be as follows: Minimise energy demand by employing the ‘fabric first approach’;</p> <ul style="list-style-type: none"> <li>• Orientation</li> <li>• Façade glazing ratio</li> <li>• Insulation</li> <li>• Thermal bridging</li> <li>• Air tightness</li> </ul> <p>Maximise energy efficiency</p> <ul style="list-style-type: none"> <li>• Lighting efficiency</li> <li>• Ventilation efficiency</li> <li>• Heating/cooling efficiency</li> </ul> <p>Utilise renewable energy (onsite)</p> <ul style="list-style-type: none"> <li>• Onsite renewables (e.g. PV, heat networks)</li> <li>• Heat pumps for heating and hot water</li> </ul> <p>Utilise renewable energy (offsite)</p> <ul style="list-style-type: none"> <li>• Offsite renewables</li> </ul> <p>The proposed energy hierarchy categories should be rephrased to reflect this approach.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Bloor is in agreement with Policy CN2 Energy Hierarchy, that energy consumption and carbon emissions reduction should be approached in a staged manner, represented by an energy hierarchy. However, it is considered that the policy should include more detail on what interventions should be considered at each stage. As currently written, the policy does not provide sufficient detail to avoid confusion in interpretation. Bloor therefore object to Policy CN2 until energy hierarchy is adopted. Broadly speaking, this should be as follows: Minimise energy demand by employing the ‘fabric first approach’;</p> <ul style="list-style-type: none"> <li>• Orientation</li> <li>• Façade glazing ratio</li> <li>• Insulation</li> <li>• Thermal bridging</li> <li>• Air tightness</li> </ul> <p>Maximise energy efficiency</p> <ul style="list-style-type: none"> <li>• Lighting efficiency</li> </ul>



	<ul style="list-style-type: none"> <li>• Ventilation efficiency</li> <li>• Heating/cooling efficiency</li> </ul> <p>Utilise renewable energy (onsite)</p> <ul style="list-style-type: none"> <li>• Onsite renewables (e.g. PV, heat networks)</li> <li>• Heat pumps for heating and hot water</li> </ul> <p>Utilise renewable energy (offsite)</p> <ul style="list-style-type: none"> <li>• Offsite renewables</li> </ul> <p>The proposed energy hierarchy categories should be rephrased to reflect this approach.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on Policies &amp; Evidence Base)</a></p> <p><a href="#">Supporting document 1 (South Winchester Vision Document)</a></p> <p><a href="#">Supporting document 2 (Response to the delivery of housing)</a></p> <p><a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a></p> <p><a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a></p> <p><a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a></p>

<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Tony Clements
<b>Personal reference number</b>	ANON-AQTS-3BX4-T
<b>Full reference number</b>	ANON-AQTS-3BX4-T/8/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The approach taken by Policy CN2 – Energy Hierarchy, should be adjusted to include reference to the positive spatial aspects of planning that will reduce energy consumption, noting that all sites should be designed and planned in ways that minimise travel demand (as a secondary component of an overall spatial strategy advanced by the Local Plan that allocates sites with this objective in mind). The pursuit of an energy hierarchy policy that includes this factor as the first consideration would be more robust.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The approach taken by Policy CN2 – Energy Hierarchy, should be adjusted to include reference to the positive spatial aspects of planning that will reduce energy consumption, noting that all sites should be designed and planned in ways that minimise travel demand (as a secondary component of an overall spatial strategy advanced by the Local Plan that allocates sites with this objective in mind). The pursuit of an energy hierarchy policy that includes this factor as the first consideration would be more robust.
<b>What is your suggested wording or text for the policy?</b>	The approach taken by Policy CN2 – Energy Hierarchy, should be adjusted to include reference to the positive spatial aspects of planning that will reduce energy consumption, noting that all sites should be designed and planned in ways that minimise travel demand (as a secondary component of an overall spatial strategy advanced by the Local Plan that allocates sites with this objective in mind). The pursuit of an energy hierarchy policy that includes this factor as the first consideration would be more robust.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Supporting Document (Planning for South Hampshire)</a>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Hampshire Hospitals NHS Foundation Trust
<b>Personal reference number</b>	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust
<b>Full reference number</b>	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/13/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Trust continue to strongly support a fabric first approach to design to reduce energy demand and running costs. We assume WCC will appreciate and accept that this will see materials proposed that do not necessarily align with traditional aesthetic aspirations. The Trust continues to seek reassurance that this is understood and acceptable to WCC.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	-
<b>What is your suggested wording or text for the policy?</b>	-
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Shirlene Oh
<b>Personal reference number</b>	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust
<b>Full reference number</b>	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/13/CN2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Full response on website. The Trust continue to strongly support a fabric first approach to design to reduce energy demand and running costs. We assume WCC will appreciate and accept that this will see materials proposed that do not necessarily align with traditional aesthetic aspirations. The Trust continues to seek reassurance that this is understood and acceptable to WCC.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (Commenting on policies)</a>

<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/12/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Wates understands the principles of proposed Policy CN2 but is unclear of its necessity as a standalone policy.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Delete the policy and include its wording in Strategic Policy CN1.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on policies and evidence base)</a>

<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-3286-C
<b>Full reference number</b>	BHLF-AQTS-3286-C/12/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website</p> <p>Legally compliant Yes  Positively prepared Yes  Sound No  Justified Yes  Compliant with the duty to cooperate Yes  Effective No  Compliant with national policy Yes</p> <p>Wates understands the principles of proposed Policy CN2 but is unclear of its necessity as a standalone policy.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Delete the policy and include its wording in Strategic Policy CN1
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	Yes <a href="#">Form (refers to letter)</a>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

Letter (Commenting on policies)



<b>Policy/Evidence base document</b>	CN2
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-328G-W
<b>Full reference number</b>	BHLF-AQTS-328G-W/12/CN2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website  Legally compliant Yes  Positively prepared Yes  Sound No  Justified Yes  Compliant with the duty to cooperate Yes  Effective No  Compliant with national policy Yes</p> <p>Wates understands the principles of proposed Policy CN2 but is unclear of its necessity as a standalone policy.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Delete the policy and include its wording in Strategic Policy CN1
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies)</a>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

**WCC Response.**

Comments noted.

[The Carbon Neutrality and Embodied Carbon Topic Paper](#) has been updated (November 2024).

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed Modifications](#) agreed with Historic England: Additional paragraph to be added between after paragraph 4.17, changes to paragraph 4.19 and 4.20 and wording of Policy CN2.

Local Plan Reference or document	Policy CN3 Energy Efficiency Standards to Reduce Carbon Emissions	
Total Number of Representations received.	32	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	19	10
Sound	5	25
Complies with Duty to Cooperate	22	7
<p><b>Summary of Representations</b></p> <p>The key concerns about Policy CN3 relate to its cost implications, technical challenges, and its alignment with national standards. Comments highlight that the stringent energy efficiency and zero-carbon targets in Policy CN3 could significantly raise construction costs by up to 20%, potentially impacting the viability of housing projects. The requirement for 100% on-site renewable energy is seen as impractical due to current grid limitations and infrastructure needs, posing risks to the affordability and housing delivery. Additionally, there is a consensus on the necessity for the alignment of Policy CN3 with national standards, like the forthcoming Future Homes Standard, to ease industry adaptation and the need to maintain consistency. Technical feasibility is another concern, as existing construction skills and materials may be inadequate for meeting the ambitious targets. Suggestions include adopting a phased approach and allowing deviations for site-specific conditions to mitigate adverse effects on housing supply. Concern was raised about achieving sustainability which sometimes conflicts with preserving heritage and high-quality design. This point relates to the integration of modern technology in historic settings. Finally, effective monitoring and compliance mechanisms are essential in order to ensure the successful implementation of the policy without hindering development progress.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BEV-9/1/CN3</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/39/CN3</b></p> <p>ANON-AQTS-3BSY-T/52/CN3</p> <p>ANON-AQTS-3BPH-6/4/CN3</p> <p>ANON-AQTS-3BB7-7/2/CN3</p> <p>ANON-AQTS-3B4K-D/5/CN3</p> <p>ANON-AQTS-3291-8/5/CN3</p> <p><b>ANON-AQTS-32CD-5 - Colden Common Parish Council/30/CN3</b></p> <p>ANON-AQTS-32GC-8/7/CN3</p> <p>ANON-AQTS-32GG-C/7/CN3</p> <p><b>ANON-AQTS-3BQ9-R - Basingstoke and Deane Borough Council/1/CN3</b></p> <p>ANON-AQTS-3298-F/7/CN3</p>		

ANON-AQTS-32G3-R/4/CN3

ANON-AQTS-32NR-X/8/CN3

ANON-AQTS-329Q-8/23/CN3

ANON-AQTS-32UU-8/4/CN3

**ANON-AQTS-32U8-B - Historic England/3/CN3**

ANON-AQTS-32G7-V/9/CN3

ANON-AQTS-32SJ-U/8/CN3

ANON-AQTS-3BQA-Z/13/CN3

ANON-AQTS-32T7-9/8/CN3

ANON-AQTS-3BX4-T/7/CN3

ANON-AQTS-3BBP-Z/6/CN3

ANON-AQTS-327B-Q/6/CN3

**ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/12/CN3**

ANON-AQTS-32ZJ-2/1/CN3

**BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/12/CN3**

BHLF-AQTS-328Q-7/9/CN3

BHLF-AQTS-328X-E/11/CN3

BHLF-AQTS-3286-C/11/CN3

BHLF-AQTS-328G-W/11/CN3

BHLF-AQTS-328K-1/10/CN3

**Main issues raised in representations received in regulation 19 consultation.**

- Cost implications of implementing Policy CN3, technical challenges, and its alignment with national standards;
- The requirement for 100% on-site renewable energy is seen as impractical due to current grid limitations;
- Alignment of Policy CN3 with national standards, like the forthcoming Future Homes Standard;
- Technical feasibility as existing construction skills and materials may be inadequate for meeting the ambitious targets and whether there should be a phased approach towards the implementation of this policy; and
- Effective monitoring and compliance mechanisms are essential in order to ensure the successful implementation of the policy without hindering development progress.

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Mr Bruce Greig
<b>Personal reference number</b>	ANON-AQTS-3BEV-9
<b>Full reference number</b>	ANON-AQTS-3BEV-9/1/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Para iv: "Onsite renewables to provide 100% of the energy consumption that is required by residential buildings, for example through the installation of photovoltaic solar panels or other suitable forms of renewable energy generating schemes that are appropriate for the location or the setting". That seems unfeasible and would require vast amounts of onsite battery storage. Back of envelope calculation: say you need 10kwh a day from storage over 30 days during winter, that's 300kwh battery, which would currently cost about £150,000 and take up an entire room.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Remove requirement for energy to come from 100% onsite renewables
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/39/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan's strategy. Given the challenges we face, there is no other option than to address these head on. Of course, future practice needs to match the good intentions, but whenever there is a perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. The Parish Council supports these policies. Support policies CN1-8 inclusive.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies)</a>



*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/52/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	CN3 is a very good step and should be fully supported and implemented.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	ReAssure Limited c/o Legal & General Real Assets
<b>Personal reference number</b>	ANON-AQTS-3BPH-6
<b>Full reference number</b>	ANON-AQTS-3BPH-6/4/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>In relation to criterion (v), consistent with our previous representations to the Regulation 18 Consultation, our client has no comments on the specific BREEAM target, but recommends that the policy be amended to remove such requirement for minor applications, or those for changes of use, whereby the ability to achieve a BREEAM target can be difficult. The requirement for such small scale applications to submit a BREEAM pre-assessment also represents an unnecessary and disproportionate burden in relation to such development, which could comprise of minor extensions or the change of use of small premises. It would also apply to physical alterations to buildings that do not create new floorspace, e.g. elevational alterations. It is therefore recommended that the Policy CN3(v) be reworded to apply only to major development for new non-residential buildings.</p> <p>Note that the Council's Consultation Comments document states that there should be no change in relation to the above, mistakenly stating that extensions or conversions would be 'permitted development' and would not therefore be covered by the Policy, despite setting out that improving energy efficiency standards for such uses is more problematic than new builds. However this does not adequately address the issue. Permitted development rights apply in limited circumstances and can be removed by specific condition attached to a planning permission, or of course by an Article 4 Direction. If the intention is for small scale alterations or extensions to existing premises, including changes of use, to be excluded, the policy should explicitly say so. As it stands, the policy wording clearly sets out that it applies to all development.</p> <p>Whilst the Council's Consultation Comments states that they don't wish to exclude all minor applications, they mistakenly only refer to this in the context of residential development, whilst our client's comments relate to non-residential development under CN3(v). As such they do not directly address the particular issue in hand. If the Council does not wish it to apply to all minor non-residential developments, it can be addressed by, for example, setting a floorspace threshold above which BREEAM applies under CN3(v) and the subsequent paragraph in relation to onsite renewables for non-residential development, e.g. a threshold of an increase in</p>

	<p>floorspace of 500 sq m GIA. Both of these parts of the policy should then explicitly exclude development that does not create new floorspace, and which such requirements would create an unnecessary burden, e.g. physical alterations to premises such as alterations to elevations.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>In relation to criterion (v), consistent with our previous representations to the Regulation 18 Consultation, our client has no comments on the specific BREEAM target, but recommends that the policy be amended to remove such requirement for minor applications, or those for changes of use, whereby the ability to achieve a BREEAM target can be difficult. The requirement for such small scale applications to submit a BREEAM pre-assessment also represents an unnecessary and disproportionate burden in relation to such development, which could comprise of minor extensions or the change of use of small premises. It would also apply to physical alterations to buildings that do not create new floorspace, e.g. elevational alterations. It is therefore recommended that the Policy CN3(v) be reworded to apply only to major development for new non-residential buildings.</p> <p>Note that the Council's Consultation Comments document states that there should be no change in relation to the above, mistakenly stating that extensions or conversions would be 'permitted development' and would not therefore be covered by the Policy, despite setting out that improving energy efficiency standards for such uses is more problematic than new builds.</p> <p>However this does not adequately address the issue. Permitted development rights apply in limited circumstances and can be removed by specific condition attached to a planning permission, or of course by an Article 4 Direction. If the intention is for small scale alterations or extensions to existing premises, including changes of use, to be excluded, the policy should explicitly say so. As it stands, the policy wording clearly sets out that it applies to all development.</p> <p>Whilst the Council's Consultation Comments states that they don't wish to exclude all minor applications, they mistakenly only refer to this in the context of residential development, whilst our client's comments relate to non-residential development under CN3(v). As such they do not directly address the particular issue in hand. If the Council does not wish it to apply to all minor non-residential developments, it can be addressed by, for example, setting a floorspace threshold above which BREEAM applies under CN3(v) and the subsequent paragraph in relation to onsite renewables for non-residential development, e.g. a threshold of an increase in floorspace of 500 sq m GIA. Both of these parts of the policy should then explicitly exclude development that does not create new floorspace, and which such requirements would create an unnecessary burden, e.g. physical alterations to premises such as alterations to elevations.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>In relation to criterion (v), consistent with our previous representations to the Regulation 18 Consultation, our client has no comments on the specific BREEAM target, but recommends that the policy be amended to</p>

	<p>remove such requirement for minor applications, or those for changes of use, whereby the ability to achieve a BREEAM target can be difficult.</p> <p>The requirement for such small scale applications to submit a BREEAM pre-assessment also represents an unnecessary and disproportionate burden in relation to such development, which could comprise of minor extensions or the change of use of small premises. It would also apply to physical alterations to buildings that do not create new floorspace, e.g. elevational alterations. It is therefore recommended that the Policy CN3(v) be reworded to apply only to major development for new non-residential buildings. We note that the Council's Consultation Comments document states that there should be no change in relation to the above, mistakenly stating that extensions or conversions would be 'permitted development' and would not therefore be covered by the Policy, despite setting out that improving energy efficiency standards for such uses is more problematic than new builds.</p> <p>However this does not adequately address the issue. Permitted development rights apply in limited circumstances and can be removed by specific condition attached to a planning permission, or of course by an Article 4 Direction. If the intention is for small scale alterations or extensions to existing premises, including changes of use, to be excluded, the policy should explicitly say so. As it stands, the policy wording clearly sets out that it applies to all development.</p> <p>Whilst the Council's Consultation Comments states that they don't wish to exclude all minor applications, they mistakenly only refer to this in the context of residential development, whilst our client's comments relate to non-residential development under CN3(v). As such they do not directly address the particular issue in hand. If the Council does not wish it to apply to all minor non-residential developments, it can be addressed by, for example, setting a floorspace threshold above which BREEAM applies under CN3(v) and the subsequent paragraph in relation to onsite renewables for non-residential development, e.g. a threshold of an increase in floorspace of 500 sq m GIA. Both of these parts of the policy should then explicitly exclude development that does not create new floorspace, and which such requirements would create an unnecessary burden, e.g. physical alterations to premises such as alterations to elevations.</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	Yes <a href="#">Letter (Commenting on policies)</a>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Peter Duff
<b>Personal reference number</b>	ANON-AQTS-3BB7-7
<b>Full reference number</b>	ANON-AQTS-3BB7-7/2/CN3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>The proposed development fails on all counts, biodiversity, landscape, green space, wilderness area, carbon footprint etc. That is obvious, you know that, so why are you even considering the plan?</p> <p>Every extra person that comes to live in Winchester raises and keeps raised the carbon footprint. as does replacing green space (as it is or has evolved into a sort of wilderness). The location is too far from the University to make it walkable very much, and there will be frequent busses laid on. Add the extra carbon footprint of further traffic created via a junction on what is perhaps Winchester's busiest artery, and the concomitant concreting over of green space with buildings and car parks (whatever the gimmick of putting plants on roofs) and there is no doubt that it will have a very adverse effect on the "carbon footprint" so beloved of the "climate emergency" brigade, also on scenery, landscape, biodiversity.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Dismiss it.
<b>What is your suggested wording or text for the policy?</b>	Dismiss it. We're not lawyers but we can see that it will be bad from virtually all your proclaimed "environmental" parameters.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	No

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*



<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Winchester Action on the Climate Crisis (WinACC)
<b>Personal reference number</b>	ANON-AQTS-3B4K-D
<b>Full reference number</b>	ANON-AQTS-3B4K-D/5/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	WinACC strongly supports the Policy CN3 introduction of LETI standards. We commend the Council for setting standards which are more ambitious than the Future Homes Standard.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Foreman Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3291-8
<b>Full reference number</b>	ANON-AQTS-3291-8/5/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>As per our comments to CN1, FH support the Local Plan contributing to the transition towards net zero carbon. However as drafted, the policy is overly prescriptive and does not recognise that this is an area that is continually developing. The policy would immediately require zero-carbon dwellings, and no transitional arrangements are set out for the implementation of the policy mindful of the emerging technologies and ability to implement at-scale.</p> <p>The impact of the policy will result in high viability impacts which must be fully considered and understood. While there is some recognition that this may not always be possible in the second paragraph ‘These should be in line with the requirements set out below unless there are exceptionally clear and compelling reasons...’ The policy does not allow for offsetting when the requirements have not been met. If the creation of a zero-carbon home to meet criteria i to iv is judged to be economically unviable, then how would a developer be able to viably offset through developer contributions to comply with the policy?</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>As per our comments to CN1, FH support the Local Plan contributing to the transition towards net zero carbon. However as drafted, the policy is overly prescriptive and does not recognise that this is an area that is continually developing. The policy would immediately require zero-carbon dwellings, and no transitional arrangements are set out for the implementation of the policy mindful of the emerging technologies and ability to implement at-scale.</p> <p>The impact of the policy will result in high viability impacts which must be fully considered and understood. While there is some recognition that this may not always be possible in the second paragraph ‘These should be in line with the requirements set out below unless there are exceptionally clear and compelling reasons...’ The policy does not allow for offsetting when the requirements have not been met. If the creation of a zero-carbon home to meet criteria i to iv is judged to be economically unviable, then how would a developer be able to viably offset through developer contributions to comply with the policy?</p>
<b>What is your suggested wording or text for the policy?</b>	As per our comments to CN1, FH support the Local Plan contributing to the transition towards net zero carbon. However as drafted, the policy is overly prescriptive and does not recognise that this is an area that is continually developing. The policy would immediately require zero-carbon dwellings, and no transitional

	<p>arrangements are set out for the implementation of the policy mindful of the emerging technologies and ability to implement at-scale.</p> <p>The impact of the policy will result in high viability impacts which must be fully considered and understood. While there is some recognition that this may not always be possible in the second paragraph ‘These should be in line with the requirements set out below unless there are exceptionally clear and compelling reasons...’ The policy does not allow for offsetting when the requirements have not been met. If the creation of a zero-carbon home to meet criteria i to iv is judged to be economically unviable, then how would a developer be able to viably offset through developer contributions to comply with the policy?</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on Policies and Evidence Base - includes tables)</a></p> <p><a href="#">Supporting document 1 (Letter re: SHELAA site CU08)</a></p> <p><a href="#">Supporting document 2 (Location Plan)</a></p> <p><a href="#">Supporting document 3 (Concept Plan)</a></p> <p><a href="#">Supporting document 4 (Illustrative masterplan)</a></p> <p><a href="#">Supporting document 5 (Access and Transport Report)</a></p> <p><a href="#">Supporting document 6 (Landscape and visual study)</a></p> <p><a href="#">Supporting document 7 (Flood Risk Assessment &amp; Conceptual Drainage Strategy)</a></p> <p><a href="#">Supporting document 8 (Interim Ecology Assessment)</a></p> <p><a href="#">Supporting document 9 (Biodiversity Net Gain Feasibility Report)</a></p> <p><a href="#">Supporting document 10 (Statutory Biodiversity Metric)</a></p> <p><a href="#">Supporting document 11 (Preliminary Noise and Vibration Summary)</a></p> <p><a href="#">Supporting document 12 (Vision Statement - Land at Station Hill, Botley)</a></p>

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/30/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	No comment but could not skip through this section
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Mandy Owen (Boyer) on behalf of Vistry Partnerships
<b>Personal reference number</b>	ANON-AQTS-32GC-8
<b>Full reference number</b>	ANON-AQTS-32GC-8/7/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Vistry Partnerships supports the move towards net zero and acknowledges the development industry has a key role to play to support this agenda. Primary concern is that of timescales. It is not clear that the housebuilding sector and the supporting supply chain will be capable of meeting the proposed policy requirements at the point the Local Plan is adopted in 2025. Many major housebuilders have signed-up to the House Builder Federation (HBF) ‘Future Homes Delivery Plan’. This process of transition requires an interim step, with new homes being expected to be ‘net zero carbon ready’ in the short-term, and fully net zero carbon in the medium-term. The ‘Net Zero Carbon Targets’ report (Elementa, September 2022), which forms part of the Draft Plan’s evidence base and is cited as a justification of this Draft Policy CN3, is silent on this important question of timing. A related concern is the draft policy expects 100% of energy consumption required by new residential homes to be generated on-site via renewable energy generating schemes. This may be achievable in some instances, but it is unlikely that every new dwelling will be able to accord with this. The policy allows for some deviation but it is likely that many if not most residential developments will be unable to fully meet zero carbon until the wider power-generation network is free from carbon-based power stations.</p> <p>The evidence base does not indicate whether on-site renewable generation (equivalent to 100% of domestic energy usage) represents a realistic proposition at this point in time and can be achieved at scale. Without this understanding, it is subsequently unclear whether meeting 100% of domestic energy needs from renewable sources could be guaranteed until the wider UK power grid / UK power generation network is free from carbon-generating power stations. The ‘Net Zero Carbon Targets’ report (Elementa, September 2022), which forms part of the consultation evidence base, is again silent on this point.</p> <p>The proposed space heating demand would require Passivhaus fabric levels, which not only exceeds national building standards, but can be difficult to achieve at scale due to inexperience of trades people building to this standard in the UK. There is also a shortage of accredited professionals, certified materials</p>

	<p>and installers which significantly impacts the ability to meet the draft policy requirements. The policy must therefore allow for the market to catch up with policy aspirations. The additional build cost of 10-15% could also affect project viability and while technologies remain expensive, there may be an impact on affordable housing delivery. Therefore, the space heating demand requirement should be subject to viability considerations.</p> <p>With regards to energy consumption, the proposed EUI figure of no more than 35 kWh/m<sup>2</sup> /year goes beyond the Future Homes Standard and will require tighter fabric requirements and renewable energy sources to achieve this net zero standard on operational energy. The current HEM model penalises renewable energy that is used in the home and not exported back to the grid. Therefore, it may take a considerable amount of fabric and technology adjustments in the specification to ensure a house type passes in HEM while meeting the EUI requirement. This EUI figure should therefore be expressed as an aspiration and not a requirement. The proposed requirement for all new housing to demonstrate that they generate the same amount of renewable energy as they demand over the course of a year could be challenging to achieve for some homes. For example, it may not be appropriate to include PV panels on every roof due to orientation vs. design requirements/views etc., and therefore there must be some flexibility built into the policy to account for this.</p> <p>Paragraph 4.27 suggests that energy performance can be calculated using Passivhaus Planning Package or CIBSE TM54. This must be expressed as an aspiration and not a requirement. Use of Passivhaus is not easy to achieve at scale and there are viability considerations in relation to the associated increased costs of this method of calculation. EUI requirements MUST be expressed as a site wide requirement, and not for individual dwellings. This is because some plots are smaller or may have rooms in the roof, impacting the ability to achieve the required number of PVs to achieve the referenced EUI levels on a plot-by-plot basis.</p> <p>The WMS notes that Local Planning Authorities can seek to apply additional standards, but only when they have a well-reasoned and robustly costed rationale. Policy CN3 does not have sufficient evidence or rationale to support the requirements and it therefore fails against the WMS and is unsound. Vistry Partnerships are suggesting Policy CN3 is wrong to be ambitious but the onus is on the Council to demonstrate what is envisaged is achievable and (importantly) achievable at scale, given the number of new homes that need to be delivered during the Plan-period. Suggests the standards specified in Policy CN3 should be phased in over the Plan-period to reflect the fact (acknowledged in the Elementa Report) that technologies become more established and widespread over time. Put more simply, what is technically feasible and scalable in 2024/25 will differ from what is achievable in 2030 and 2040.</p>
<b>What modification(s) are necessary to make the</b>	Winchester City Council (WCC) should have regard to the likely viability of the requirements in this draft Policy and should consider changing the wording to require new homes to be net zero carbon ready as the decarbonisation of the national grid is not within the control of housebuilders.

<b>policy legally compliant or sound?</b>	Vistry Partnerships recommend the proposed policies within the Draft Local Plan align with Building Regulations and Future Homes Standards rather than exceed them.
<b>What is your suggested wording or text for the policy?</b>	Winchester City Council (WCC) should have regard to the likely viability of the requirements in this draft Policy and should consider changing the wording to require new homes to be net zero carbon ready as the decarbonisation of the national grid is not within the control of housebuilders. Vistry Partnerships recommend the proposed policies within the Draft Local Plan align with Building Regulations and Future Homes Standards rather than exceed them.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and evidence base - includes tables)</a> <a href="#">Supporting document 1 (Affordable Housing Statement)</a> <a href="#">Supporting document 2 (Vision Document 1 - Pitt Vale)</a> <a href="#">Supporting document 3 (Vision Document 2)</a> <a href="#">Supporting document 4 (Landscape and Visual Technical Note)</a> <a href="#">Supporting document 5 (Biodiversity Net Gain Feasibility Report)</a>

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Mark Behrendt
<b>Personal reference number</b>	ANON-AQTS-32GG-C
<b>Full reference number</b>	ANON-AQTS-32GG-C/7/CN3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>The proposed policy position would require all new development to demonstrate net zero operational carbon onsite by ensuring energy use standard for all new dwellings of 35kwh/m2/year and space heating demand of less than 15 kwh/m2/year. Whilst the HBF would agree with the Council that there is a need to act to reduce carbon emissions we would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations provides a single approach that all developers understand and can be rolled out at scale, supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced.</p> <p>If the Council chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and gives consideration as to how the requirements are consistent with the WMS. It is important to note the High Court judgement from the 2nd of July 2024 ([2024]EWHC 1693 Admin) and the challenge by Rights Community Action. The claim failed on all three grounds – further commentary on this claim have been included in the full representation below. The WMS compliant with legislation but also the intention of Planning and Environment Act 2008 was to ensure that any policies seeking improved standards on those set out in Building Regulations must be set within the framework of those regulations. Local plan policies which seek to apply an alternative standard would not only be inconsistent with the WMS but also with the intentions of the legislation. The 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures:</p> <ul style="list-style-type: none"> <li>• That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.</li> <li>• The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).</li> </ul>



HBF do not consider the approach set out in CN3 to be consistent with the WMS nor that the implications of such a policy have been properly assessed in the supporting evidence base. Our detailed points are set out below.

The approach proposed by the Council based on energy use is inconsistent with the approach set out in the WMS and as such is unsound. If the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate and not as an energy use target in order to avoid fragmentation of the standards with different requirements being set in different areas which it must be recognised was not only an expectation of the WMS but also of the legislation that permits council to adopt higher standards in local plan in the first place. As such the HBF do not consider the council to be justified in departing from either the WMS or the Planning and Energy Act (2008) and the section of the policy under the heading “All New Residential Development” and paragraph 4.27 and 4.28 should be deleted. While HBF do not consider the policy to be consistent with national policy we are also concerned that the Council has not properly considered the impact on viability or the deliverability of development. The Council will need to ensure the costs and deliverability of this policy are fully and robustly tested. The costs for similar standards to those being proposed can be found in the FHH report ‘Ready for Zero’. This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council. The various specifications and costs considered are summarised in Figure 8 of Ready for Zero and indicates that in order to deliver standards above the FHS on a three bedroomed end of terrace house (specifications CS3, CS4 and CS5 in the FHH report) would be around 15-19% higher than the 2021 Building Regs, around £17,000 to £22,000 more per unit. The council’s evidence in the suggests the costs of achieving its proposed policy for a similar typology to be 5.8%. Given that there is still significant uncertainty as to the cost of delivering the standards being proposed the Council will need ensure that further sensitivity testing is undertaken in the viability study.

With regard to deliverability of zero carbon homes HBF would not disagree that the proposed standards are technically feasible. However, concerned on the rates at which sites can deliver new homes on all types of sites. Given that the standards proposed are higher than those proposed by Government in the Future Homes Standard and will require higher levels of fabric efficiency, which in turn will require new skills and materials that may not be readily available, HBF are concerned this could slow delivery in the short to medium term as supply chains are developed. It has been recognised by the FHH that to deliver higher standards will require phased transitional arrangements to enable a steady build-up of skills and ensure quality. The FHH also notes in its report Ready for Zero that even if a short transition period between current standards and those similar to the Council are proposing that this would “... create a high risk of quality problems, inflated costs and, potentially, stalled build programmes.” However, HBF could find no evidence that the Council has considered whether its proposed standard will impact on the rate at which new homes

	<p>can be built. The Council will need to speak directly to a range of housebuilders operating in Winchester to understand the impact of its policy on the rate at which homes will be delivered on its allocated sites. Without any consideration of delivery then the Council's decision to go beyond what is required by building regulations is clearly unjustified. While HBF understands the desire for LPAs to go further current policy recognises that even where development can viably implement higher standards this must be within a consistent technical framework and approach to assessing building performance against those technical standards. Indeed, this has long been the case in planning policy with paragraph 159b of the NPPF stating that "Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards". If the Council have the evidence to show that the policy is deliverable the Council will need to ensure that all other policies in the local plan are consistent with delivering the levels of embodied carbon being proposed. The most energy efficient design will inevitably lead to less variety in the built form in order to reduce the surface area of the building. This will need to be reflected in design policies and any design codes that are produced to ensure that development is not refused for seeking to meet energy efficiency standards but, for example, not being designed in the character of the local area. HBF would also recommend that that if a net zero policy is to be included in the local plan it should require a development to be net zero rather than for individual homes. As the council will be aware some homes, such as terrace houses and flats, are more intrinsically energy efficient and emit less carbon compared to detached homes and bungalows. As such it may be difficult for some individual homes to be net zero but where there is a mix of development the site as a whole to achieve the required standard.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been</i></p>	<p>Yes  <a href="#">Form (copy of form - refers to letter)</a>  <a href="#">Letter (Commenting on policies and evidence base)</a></p>

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Thoma Light
<b>Personal reference number</b>	ANON-AQTS-3BQ9-R - Basingstoke and Deane Borough Council
<b>Full reference number</b>	ANON-AQTS-3BQ9-R - Basingstoke and Deane Borough Council/1/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	In terms of energy efficiency standards, we note Winchester's approach, in particular using the LETI energy efficiency standards for residential dwellings. We very much support a proactive approach and will be interested to follow this issue through the Local Plan's Examination in Public
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Hargreaves Properties Ltd
<b>Personal reference number</b>	ANON-AQTS-3298-F
<b>Full reference number</b>	ANON-AQTS-3298-F/7/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Whilst fully supporting the push to reduce carbon emissions, Hargreaves is concerned that on some developments BREEAM excellent is difficult to achieve and could render smaller developments in particular unviable. The London Plan (2021) recognises this and applies the requirement to major developments only. As a minimum, some flexibility should be imported into the policy to agree a variation to the standard at the planning stage if the pre-assessment demonstrates practical or viability issues with compliance. As currently worded, the policy is not considered to be 'justified' or 'effective'
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The Policy should apply to 'major' development only (as defined by the Town and Country Plan (Development Management Order)) and should also allow flexibility to agree alternative standards where there are real practical or viability issues involved with obtaining excellence.
<b>What is your suggested wording or text for the policy?</b>	Suggested amendments: v. Major Non-residential development should meet the 'BREEAM Excellent' standard or an agreed equivalent industry standard assessment process. Developers that propose a scheme to meet BREEAM standards should submit a post construction assessment and BREEAM certificate to the local planning authority to demonstrate compliance. At outline planning application stage, a commitment to BREEAM Excellent should be made, and at full planning application a BREEAM pre-assessment should be provided. In the event that this demonstrates real practical or viability issues in meeting the Excellent standard evidence should be submitted to demonstrate an alternative standard, to be agreed with the Council.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	Yes <a href="#">Letter (commenting on policies)</a>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	KW Forum Limited
<b>Personal reference number</b>	ANON-AQTS-32G3-R
<b>Full reference number</b>	ANON-AQTS-32G3-R/4/CN3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Kennedy Wilson responded to the Regulation 18 draft Local Plan consultation and were given the reference ANON-KSAR-NKFC-K. The representation broadly supported draft Policy CN3 but asked that the policy should provide flexibility for deviations from the standards requested “where it is demonstrated to not be feasible or viable”. The inclusion of this wording allows for technical and practical design reasons to be considered, which is a sound approach.</p> <p>We note that the Council has amended the wording of this policy to include the following wording: “These should be in line with the requirements set out below unless there are exceptionally clear and compelling reasons. These reasons should be established through the design process and demonstrate that achieving these standards produces a development that would be harmful to its setting or the character of the wider area or it is demonstrated that is not practical.” We broadly support this amended text as it does respond to our previous representations; however, we would prefer to see the words “...or financial viable” added to the end of the sentence. There may well be circumstances where development viability is challenging and the cost of meeting the standards set out in draft Policy CN3 is one of the factors contributing to inflated / significant building costs. We would also welcome a paragraph in the sub-text to expand on the point of practicality/viability being a reason to not comply with the requirements to their fullest for greater clarity on this matter.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Kennedy Wilson responded to the Regulation 18 draft Local Plan consultation and were given the reference ANON-KSAR-NKFC-K. The representation broadly supported draft Policy CN3 but asked that the policy should provide flexibility for deviations from the standards requested “where it is demonstrated to not be feasible or viable”. The inclusion of this wording allows for technical and practical design reasons to be considered, which is a sound approach.</p> <p>We note that the Council has amended the wording of this policy to include the following wording: “These should be in line with the requirements set out below unless there are exceptionally clear and compelling reasons. These reasons should be established through the design process and demonstrate that achieving these standards produces a development that would be harmful to its setting or the character of the</p>

	<p>wider area or it is demonstrated that is not practical.” We broadly support this amended text as it does respond to our previous representations; however, we would prefer to see the words “...or financial viable” added to the end of the sentence. There may well be circumstances where development viability is challenging and the cost of meeting the standards set out in draft Policy CN3 is one of the factors contributing to inflated / significant building costs. We would also welcome a paragraph in the sub-text to expand on the point of practicality/viability being a reason to not comply with the requirements to their fullest for greater clarity on this matter.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Kennedy Wilson responded to the Regulation 18 draft Local Plan consultation and were given the reference ANON-KSAR-NKFC-K. The representation broadly supported draft Policy CN3 but asked that the policy should provide flexibility for deviations from the standards requested “where it is demonstrated to not be feasible or viable”. The inclusion of this wording allows for technical and practical design reasons to be considered, which is a sound approach.</p> <p>we note that the Council has amended the wording of this policy to include the following wording:  “These should be in line with the requirements set out below unless there are exceptionally clear and compelling reasons. These reasons should be established through the design process and demonstrate that achieving these standards produces a development that would be harmful to its setting or the character of the wider area or it is demonstrated that is not practical.”</p> <p>We broadly support this amended text as it does respond to our previous representations; however, we would prefer to see the words “...or financial viable” added to the end of the sentence. There may well be circumstances where development viability is challenging and the cost of meeting the standards set out in draft Policy CN3 is one of the factors contributing to inflated / significant building costs.</p> <p>We would also welcome a paragraph in the sub-text to expand on the point of practicality/viability being a reason to not comply with the requirements to their fullest for greater clarity on this matter.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Letter (covering letter)</a>  <a href="#">Supporting information (Employment Land matters)</a>  <a href="#">Supporting documents (comments on policies)</a></p>



*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Ed Flood (Agent on behalf of Sparsholt College)
<b>Personal reference number</b>	ANON-AQTS-32NR-X
<b>Full reference number</b>	ANON-AQTS-32NR-X/8/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The College agrees and supports the move towards net zero and acknowledges that the development industry has a key role to play to support this agenda. The draft policy sets out a range of standards that (in summary) prohibit the use of fossil fuels for the purposes of heating or cooking. The policy also requires that non-residential developments will be expected to submit details of total installed capacity and generation, as well as details of rooftop PV. In addition, draft Policy CN3 does not clarify whether the BREEAM 'Excellent' standard applies to all non-residential development, regardless of size or use. Meeting these standards do not come without cost, which even for a growing educational establishment such as Sparsholt College may prove to be prohibitive for some projects.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Again, we would recommend the proposed policies within the Draft Local Plan also align with the emerging updates to Part L of the Building Regulations to ensure an appropriate target trajectory which can be realistically achieved.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	No

*However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/23/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>The commitment of the Council to offer leadership for the district to be carbon neutral by 2030 is noted, ahead of the UK's legally binding target of 2050. Bloor Homes is concerned that the scale of step change proposed may be too stretching in practice for the construction industry to adapt to and a phased approach is preferred to ensure that change is deliverable. Practical issues around whether a local approach will be onerous to assess and apply in practice due to the technical complexities. Generally, an approach that links to national standards and regulations is preferred which apply across local authority boundaries and provides for consistency in the market. Delivering improvements to energy efficiency through building regulations has the advantage over delivering varying approaches across the country, in that it provides a single approach that all developers understand and can be rolled out at scale.</p> <p>As noted at paragraph 4.22 of the consultation document, the Future Homes standard is to be introduced nationally from 2025, to ensure that new homes built from this time achieve 75-80% less carbon emissions than homes delivered under the old regulations. Given that the earliest that the Local Plan will be adopted is October 2025 a phased approach which includes standards applicable from 2025 (in line with the Future Homes standard) should be considered. If the local plan is to go beyond existing and forthcoming standards, it must ensure that policy requirements are consistent with national policy and with the WMS and must take account of the High Court Judgement of 2nd July 2024 [2024] EWHC 1693 Admin and Target Emission Rates (TER) and that it was not open to local authorities to choose measures other than this. The Council wrote to the Secretary of State expressing concern that the Written Ministerial Statement restricted the ability to set energy performance standards other than through TER, measured through the Standard Assessment Procedure (SAP). The response received confirms that whilst local plan makers are not precluded from setting standards that go further than Building Regulations.</p> <p>The impact of the additional requirements set out in draft Policy CN3 on the viability and deliverability of development must be demonstrated. Bloor Homes does not consider to be the case. Whilst it is</p>

	<p>acknowledged that some financial modelling of the cost implications of the additional requirements has been undertaken, Bloor Homes does not consider that the costs of implementation of the draft policy have been fully and properly considered and underestimates the true cost of this policy, It is not therefore justified. The draft policy also includes on-site renewable energy generation requirements that appear overly prescriptive for certain types of site. The installation of effective solar generation, for example, will not be feasible for every site – due to shading, site size or heritage considerations, for example. In these circumstances it may simply not be possible to achieve net-zero operational carbon on-site and off-site renewable energy generation and offsets may be necessary. The policy is currently silent on these aspects, but they may need to be considered as part of the phased approach to introducing the local standards so that the policy can be effective. In addition, there is a lack of recognition that there is often a mismatch between renewable electricity generation and consumption, particularly during winter months, which has the potential to limit the ability to balance demand with generation.</p> <p>Bloor Homes objects to the imposition of the requirement in draft Policy CN3 to provide energy model and calculations in relation to outline applications. It is unlikely to be feasible or practical to provide such information at this stage, as insufficient detail may be known to enable such information to be provided in a meaningful way. Bloor Homes consider that such information should be provided at the detailed stage of the application process. The policy should be revised to state that outline applications are not expected to undertake assessment of embodied carbon emissions. Draft Policy CN3 also fails to recognise the Government’s commitment to decarbonize electricity generation by 2035 and the requirement for gas boilers to be banned from 2035. Given that the plan is intended to run to 2040, this should be acknowledged within supporting text and provision made within the application of this policy for the achievement of these targets and also future changes to legislative requirements and national policy related to climate change targets. In light of the above Bloor Homes objects to draft Policy CN3 and requests that amendments are made to Policy CN3 which have been included in full in their representation below.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Bloor Homes objects to the imposition of the requirement in draft Policy CN3 to provide energy model and calculations in relation to outline applications. It is unlikely to be feasible or practical to provide such information at this stage, as insufficient detail may be known to enable such information to be provided in a meaningful way. Bloor Homes consider that such information should be provided at the detailed stage of the application process. The policy should be revised to state that outline applications are not expected to undertake assessment of embodied carbon emissions.</p> <p>Draft Policy CN3 also fails to recognise the Government’s commitment to decarbonize electricity generation by 2035 and the requirement for gas boilers to be banned from 2035. Given that the plan is intended to run to</p>

	<p>2040, this should be acknowledged within supporting text and provision made within the application of this policy for the achievement of these targets and also future changes to legislative requirements and national policy related to climate change targets. Bloor Homes objects to draft Policy CN3 and requests that amendments are made to Policy CN3 which have been included in full in their representation below.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Bloor Homes objects to the imposition of the requirement in draft Policy CN3 to provide energy model and calculations in relation to outline applications. It is unlikely to be feasible or practical to provide such information at this stage, as insufficient detail may be known to enable such information to be provided in a meaningful way. Bloor Homes consider that such information should be provided at the detailed stage of the application process. The policy should be revised to state that outline applications are not expected to undertake assessment of embodied carbon emissions. Draft Policy CN3 also fails to recognise the Government’s commitment to decarbonize electricity generation by 2035 and the requirement for gas boilers to be banned from 2035. Given that the plan is intended to run to 2040, this should be acknowledged within supporting text and provision made within the application of this policy for the achievement of these targets and also future changes to legislative requirements and national policy related to climate change targets.</p> <p>Bloor Homes objects to draft Policy CN3 and requests that amendments are made to Policy CN3 which have been included in full in their representation below.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map and evidence base)</a>  <a href="#">Vision document (Land At Mill Lane, Wickham)</a></p>

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Crest Nicholson Partnerships and Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32UU-8
<b>Full reference number</b>	ANON-AQTS-32UU-8/4/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b> [Please see formatted submission below]</p> <p>The construction of energy efficient homes that are adaptable and flexible is supported, but Crest Nicholson considers that such requirements could and should be mandated most effectively, nationally via the Building Regulations, thereby applying a consistent national standard that all developments should be required to meet, irrespective of location. Crest Nicholson recognises fully the importance of delivering development that is truly sustainable and appreciates the role that the development industry must play in this respect. It will be important to ensure that the policies and ambitions that are set out within the Plan are in step with the national agenda and can be fully justified through the examination process. This will necessarily require a full and thorough assessment of the potential impacts on delivery of the Local Plan strategy, the viability of which will be affected by any application of locally specific standards.</p> <p>Local Plans have a vital and effective role to play in addressing climate change and the delivery of carbon neutral development, but this is often most appropriately addressed via the spatial expression of planning policies, i.e. where development is located relative to jobs, services, facilities and other travel demand generators, for instance. Planning also clearly has a role to play in making provision for developments that support renewable energy generation, but there is limited justification for transposing requirements relating to technical building standards into planning policies where these are consistent and merely reflect provisions that will otherwise be required to be achieved through compliance with the Building Regulations. The Framework is clear in its approach at Paragraph 159:</p> <p>“New Development should be planned for in ways that (our emphasis):</p> <ol style="list-style-type: none"> <li>1. Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and</li> </ol>

	<p>2. Can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.” Furthermore, the WMS sets out situations where emerging local plans seek to impose standards beyond national regulations. Policy CN3 states that new residential development will need to be able to demonstrate net-zero operational carbon on site by ensuring a number of measures in respect of predicted space heating demand, energy consumption of the buildings and on-site renewables.</p> <p>Whilst Crest Nicholson recognises the Council’s aspirations to include energy standards which go beyond existing building regulations this policy should be consistent with the national policy approach that is set out currently by the Written Ministerial Statement. As Policy CN3 seeks to exceed the minimum energy efficiency requirements of the current Building Regulations, the justification requires a well-reasoned and robustly costed rationale to demonstrate viability, otherwise it should be rejected at Examination. It is not clear whether the Council have provided robust evidence to demonstrate that development would remain viable and the impact on housing supply and affordability has been properly considered. This will be necessary for the Local Plan to be justified.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Policy CN3 is contrary to the Framework which advises that any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards. The policy is therefore not consistent with national policy, one of the four tests of soundness.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Policy CN3 is considered unnecessary as the matters it covers will be dealt with under national regulations.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Supporting document 1 (commenting on policies and evidence base)</a>  <a href="#">Supporting document 4 (Policy CN3 comments)</a></p>



*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Guy Robinson
<b>Personal reference number</b>	ANON-AQTS-32U8-B - Historic England
<b>Full reference number</b>	ANON-AQTS-32U8-B - Historic England/3/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The 2 in CO2 should be subscript rather than superscript</p> <p>Is the intention for the text on non-residential development to apply only to new non-residential development? What if the building is listed? Would the Council seek to implement the same policy approach? Currently this is unclear. We note the section on residential development makes clear in its wording and subheading that it applies only to new development. The same cannot be said of non-residential development. We believe this should refer to “New non-residential development” to avoid potential policy support for a standard that could be inappropriate and harmful for certain historic buildings.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	<p>“New non-residential development v. New non-residential development should meet the ‘BREEAM Excellent’ standard or an agreed equivalent industry standard assessment process. Developers that propose a scheme to meet BREEAM standards should submit a post construction assessment and BREEAM certificate to the local planning authority to demonstrate compliance. At outline planning application stage a commitment to BREEAM Excellent should be made, and at full planning application a BREEAM preassessment should be provided.</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	<p>Yes</p> <p><a href="#">Letter (commenting on policies)</a></p> <p><a href="#">Email correspondence (between officers and Historic England)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

Email correspondence (between officers and Historic England re: suggested changes)

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Bargate Homes
<b>Personal reference number</b>	ANON-AQTS-32G7-V
<b>Full reference number</b>	ANON-AQTS-32G7-V/9/CN3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Bargate Homes have concerns regarding the available technology to achieve these aims and why the Local Plan policy needs to be in excess of building regulations which manage how the industry evolves and adapts. Whilst Bargate Homes are committed to delivering sustainable homes which include air source heat pumps, PV panels, car charging points and other fabric benefits, we have concerns that trying to achieve a self-sufficient development will result in grid-like designs of houses to maximise solar gain (required for energy generation) which shall conflict with the Council's and Government's urban design and build back beautiful agendas.</p> <p>In practical terms, where is the off-site storage of summer energy going to be collected? Who puts in the provision for the wider grid to store energy from this development, and if energy is being received back from the grid, how can it be qualified as 100% renewable when we are not certain of its source? These measures go significantly beyond Part L and the Future Homes Standard which is impractical.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Part iv. of the policy should be reduced from 100% of the development energy consumption should be supported by onsite renewables or expressed as a target where practical and not mandatory.
<b>What is your suggested wording or text for the policy?</b>	iv. A target of onsite renewables to provide 100% of the energy consumption that is required by residential buildings where practical, for example through the installation of photovoltaic solar panels or other suitable forms of renewable energy generating schemes that are appropriate for the location or the setting.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>
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<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Mar, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/8/CN3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>The Policy sets out the requirement to deliver new residential development that complies with the LETI standards. These standards go above and beyond the proposed Future Homes Standards to be incorporated with Part L of the Building Regulations. While this is commended, in order for the Local Plan to be found sound when it comes to Examination it is essential that any requirements that go beyond current or planned building regulations are well-reasoned and include a robustly costed rationale that ensures development remains viable and that the impact on housing supply and affordability is considered in accordance with the NPPF.</p> <p>This position is highlighted within Housing Minister Lee Rowley’s written ministerial statement (WMS) that accompanied the current consultation on the Future Homes and Buildings standards to be delivered by way of changes to Building Regulations (12 December 2023). The WMS states: “... the introduction of the 2021 Part L uplift to the Building Regulations set national minimum energy efficiency standards that are higher than those referenced in the 2015 WMS rendering it effectively moot. A further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continues to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes. The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.”</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and evidence base re: Land at Harestock Road)</a>

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/13/CN3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Bloor support the need to reduce carbon emissions and tackle climate change, however object to the solution proposed in CN3. Policy CN3 sets out Energy Efficiency Standards to Reduce Carbon Emissions. Bloor recognise that Policy CN3 is clearly a very significant policy in terms of the Council’s ambition to deliver net zero development as well as the delivery of much needed new housing and non-domestic buildings in the district. Bloor supports the Council’s commitment to delivery of net zero housing. However, in its current form, we do have significant concerns that the Policy is unsound and could lead to a reduction in the delivery of much needed private and affordable dwellings. Bloor object to Policy CN3 as drafted. Policy CN3 is supported by evidence base documents which present the technical and financial information to justify the draft policy. Savills Earth, on behalf of Bloor have carefully reviewed draft Policy CN3 and its supporting evidence base document and have a number of concerns and suggestions which, if addressed, would result in a sound and effective net zero policy. Please see representation below for suggested wording.</p> <p>Whilst Bloor disagree that this needs to be undertaken through the Local Plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the county, in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced. The Government states in the introduction of the 2023 FHS consultation that the 2025 Future Homes and Buildings Standards aim to build on the 2021 Part L uplift and set even more ambitious requirements for energy efficiency and heating for new homes and non-domestic buildings. These standards will be in line with meeting our 2050 net zero target and will mean no further work will be needed for new buildings to produce zero carbon emissions as the electricity grid decarbonises. If WCC chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and gives consideration as to how the requirements are consistent with the WMS and . the High Court judgement from the 2nd of July 2024 ([2024]EWHC 1693 Admin). This</p>



judgement was on the challenge to the WMS made by Rights Community Action on three grounds – further details on these three grounds are in the representation below. The Minister also addressed the overall intention of clause 1(2) in the following terms: “The intention was for local authorities, in setting energy efficiency standards, to choose only those standards that have been set out or referred to in regulations made by the Secretary of State, or which are set out or endorsed in national policies or guidance issued by the Secretary of State. That approach was taken with a view to avoiding the fragmentation of building standards, which could lead to different standards applying in different areas of the country”.

As set out within the HBF representation to the WCC R19 Local Plan, moving to the WMS itself, the housing minister notes that “Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes” and that local standards can “add further costs to building new homes by adding complexity and undermining economies of scale”. After noting these concerns, the 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale. Bloor do not consider that WCC have properly and fully considered the implications of this policy on the deliverability and viability of new development. The proposed standards are higher than the proposed FHS expected to be introduced in 2025 and seemingly will require higher levels of fabric efficiency. This will require new skills and materials that may not be readily available, and which could slow delivery in the short to medium term as these are developed. As such consideration will need to be given as to the delivery rates of development in the early years of the plan period with fewer homes potentially coming forward in this period as these much higher standards will take time to embed. Bloor and Savills Earth agree with these conclusions drawn by the HBF in their representation to WCC.

WCC must also ensure that the costs of its implementation are properly reflected in the viability evidence. The WCC Local Plan Viability Study states on page 15, paragraph 3.31 that there are a range of sources as to costs and the assumption made is that it will fall in the range of an additional 5.0-5.8% on base build costs over the 2021 Building Regulations Part L update. Bloor considers this is an underestimate of the costs. The Future Homes Hub has undertaken some work to support and inform the implementation of the FHS which is set out in “Ready for Zero”. This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council, however it must be noted that these are based on the use of SAP which the Council consider to underestimate the energy efficiency performance of new homes. “Ready for Zero” indicates that in order to deliver a similar standard to that being proposed by the Council would be around a 15% to 20% increase in per unit costs (c. £17,000 to £22,000 more per unit as per the HBF representation to WCC) compared to the 2021 Building Regulations Part L. Whilst the specifications and assessment methodology may not be directly comparable to those being proposed by the Council it provides an indication as to the costs and that these are likely to be higher than those proposed in the viability

assessment. The second bullet point in the WMS quoted above requires any policy to be expressed as a percentage uplift to the Total Emissions Rates calculated using the specified version of the Standard Assessment Procedure (SAP). As such the Council's policy, which requires development to achieve a specified level of space heating demand and energy use is inconsistent with national policy. The Council will need to amend its policy in line with this statement and ensure that it is consistent with SAP. Bloor note that the Council state in paragraph 4.27 of the R19 LP that an accurate predictive energy modelling, such as Passivhaus Planning Package or CIBSE TM54, should be used in the energy assessment. If the policy is considered to be justified, then any statement / evidence required with regard to development achieving the standard set out in policy must also be based on SAP. The requirement of any other assessment package would be inconsistent with national policy.

Bloor agrees with the drive to generate as much energy as possible on site to offset energy use. However, the current proposed policy ignores the fact that solar energy generation rarely matches energy demand at the time it is produced, therefore leading to excess energy generated that is not consumed on-site. For residential schemes this is especially apparent, where occupants are often out during the day (when energy is being generated but not consumed) and at home during the morning and evening (where it is being consumed but not generated). Solar energy production is at its highest during the middle of the day, in summer; whilst no energy is generated outside daylight hours and only small quantities are generated during winter. This is different to how most occupiers use energy, with more energy consumed during the cold months and often outside daylight hours to provide heating and lighting. This mismatch between consumption and generation leads to excess energy being generated during certain times of the year (summer) and more energy being consumed during other times of the year (winter). The proposed policy wording suggests that energy generation and consumption should be balanced over the course of a year for a net zero carbon development. The excess energy produced by a renewable installation can either be exported back to the grid where it can be used by other consumers or curtailed. Curtailment effectively wastes the energy generated. The extent to which excess power can be exported to the grid and used effectively is dependent on the available capacity in the local grid, which is determined and managed by the local distribution network operator. Savills Earth confirm that if PV arrays are sized to generate as much power as is consumed onsite over the course of a year without sufficient grid export capacity, power generated on site will be wasted due to curtailment. This creates additional wastage due to the embodied carbon and resources used to produce superfluous PV panels.

In recent years, the UK national grid capacity has become more and more constrained due to increasing amounts of decentralised energy generation. Without significant grid reinforcement that is aligned with the delivery of housing and employment, additional power being exported to the grid has the potential to hinder further development in the area being able to export power. Policy CN3, requiring the total annual consumption to be offset via generation from solar PV arrays has the potential to lead to oversized generation

	<p>capacity that has an on-site utilisation rate of between 35-50%, meaning that over half of the energy generated by the panels is at risk of being lost if there is no export capacity. If buildings are of residential use, then the scheme is likely to have a more mismatched generation/consumption profile than, for instance, a commercial scheme. This would lead to an even lower utilisation, with between 25-30% of the energy generated being used on site. Bloor consider, that it is therefore paramount that the policy sets out a more flexible requirement for on-site generation that would allow developers to design arrays that maximise panel utilisation and on-site consumption, to avoid resource wastage and issues with the distribution network. Savills Earth would encourage the Council to liaise with UK Power Networks and understand the existing state of the grid and how this policy could impact the future development in the area. The risk of saturating the power network is significant and there is a possibility it could hinder future development and delivery of the Plan. Savills Earth consider that Policy CN3 should be revised as follows. Unless these adaptations are made, Bloor will continue to object to this policy.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Bloor support the need to reduce carbon emissions and tackle climate change, however object to the solution proposed in CN3.</p> <p>Please see representation below for the suggested amendments to Policy CN3.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Please see representation below for the suggested amendments to Policy CN3.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on Policies &amp; Evidence Base)</a></p> <p><a href="#">Supporting document 1 (South Winchester Vision Document)</a></p> <p><a href="#">Supporting document 2 (Response to the delivery of housing)</a></p> <p><a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a></p> <p><a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a></p> <p><a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a></p>

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Hathor Property
<b>Personal reference number</b>	ANON-AQTS-32T7-9
<b>Full reference number</b>	ANON-AQTS-32T7-9/8/CN3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>The Policy sets out the requirement to deliver new residential development that complies with the LETI standards. These standards go above and beyond the proposed Future Homes Standards to be incorporated with Part L of the Building Regulations. While this is commended, in order for the Local Plan to be found sound when it comes to Examination it is essential that any requirements that go beyond current or planned building regulations are well-reasoned and include a robustly costed rationale that ensures development remains viable and that the impact on housing supply and affordability is considered in accordance with the NPPF. This position is highlighted within Housing Minister Lee Rowley’s written ministerial statement (WMS) that accompanied the current consultation on the Future Homes and Buildings standards to be delivered by way of changes to Building Regulations (12 December 2023). The WMS states: “... the introduction of the 2021 Part L uplift to the Building Regulations set national minimum energy efficiency standards that are higher than those referenced in the 2015 WMS rendering it effectively moot. A further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continues to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes. The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.”</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and proposed site)</a>

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Tony Clements
<b>Personal reference number</b>	ANON-AQTS-3BX4-T
<b>Full reference number</b>	ANON-AQTS-3BX4-T/7/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>The construction of energy efficient homes that are adaptable and flexible is supported, but Vistry and Taylor Wimpey consider that such requirements could and should be mandated most effectively, nationally, via the Building Regulations and the Future Homes Standard (FHS), thereby applying a consistent national standard that all developments should be required to meet, irrespective of location.</p> <p>The Council is electing to impose requirements locally that go beyond current standards, in doing so it must be able to demonstrate that this is consistent with national policy and is in accordance with the provisions of the most recent written ministerial statement (WMS) addressing the matter (13/12/2023). In addition, the policy approach should have clear regard to the recent High Court judgement ([2024] EWHC 1693 Admin – 02/07/2024), which challenged the WMS, a ground of which argued that the WMS unduly restricted local authorities in exercising powers granted to them in respect of policies addressing climate change. The challenge failed on all three grounds and confirmed that energy efficiency standards that are included within local plan policies should be within the scope of the Building Regulations to avoid circumstances where multiple, inconsistent regulatory requirements are set.</p> <p>To ensure the policy is sound the Council must be able to demonstrate that the requirements of the WMS are adhered to fully; additional standards over and above Building Regulations, which provide the baseline technical standard for all new homes, should be required only if they address a clearly evidenced locally occurring need, justified by locally specific data and where their impact on viability has been considered. This position is reinforced by NPPG, paragraphs 007 Reference ID: 56-007- 20150327; and 020 Reference ID: 56-020-20150327. It is acknowledged that the City Council has an ambition to accelerate the move towards carbon neutrality as a proactive response to climate change and this is supported in overall terms. Vistry and Taylor Wimpey recognise the importance of delivering development that is truly sustainable and appreciate the role that the development industry must play in this respect. The Council must ensure that its</p>

	Plan is in-step with national policy frameworks in this respect and demonstrate that the approach taken locally is justified and sound.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The spatial strategy that underpins the plan is not sufficiently rooted in tackling climate change because it fails to focus development at locations where the opportunity to support sustainable lifestyles is greatest. The planning system is concerned principally with the development and use of land; therefore, the most effective contribution that can be made to combatting climate change is through the preparation of spatial development strategies within Local Plans that allocate land for development in locations that actively support the adoption of sustainable lifestyles.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Supporting Document (Planning for South Hampshire)</a>



<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Andrew Uwins
<b>Personal reference number</b>	ANON-AQTS-3BBP-Z
<b>Full reference number</b>	ANON-AQTS-3BBP-Z/6/CN3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Hazeley do not consider that WCC have properly and fully considered the implications of this policy on the deliverability and viability of new development. WCC must also ensure that the costs of its implementation are properly reflected in the viability evidence.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies - includes pictures)</a>

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Alice Lack
<b>Personal reference number</b>	ANON-AQTS-327B-Q
<b>Full reference number</b>	ANON-AQTS-327B-Q/6/CN3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The proposed standards are higher than the proposed FHS expected to be introduced in 2025 and seemingly will require higher levels of fabric efficiency. This will require new skills and materials that may not be readily available, and which could slow delivery in the short to medium term as these are developed. As such consideration will need to be given as to the delivery rates of development in the early years of the plan period with fewer homes potentially coming forward in this period as these much higher standards will take time to embed. Welbeck agree with the conclusions drawn by the HBF in their Reg 19 representation to WCC.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes <a href="#">Letter (commenting on Policies)</a>

*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Hampshire Hospitals NHS Foundation Trust
<b>Personal reference number</b>	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust
<b>Full reference number</b>	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/12/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The Trust note the expansion of detail in this policy concerning achieving BREEAM Excellent certification; this continues to align with NHS Policy. However, the Trust wish to object that the policy has not been amended to reflect that the NHS allows reasonable derogation where overriding healthcare demands dictate.</p> <p>The Trust remain likely to support any renewable and low carbon energy scheme arising. The Trust has a plan for decarbonisation of the RHCH site based on electrification and renewables. Investigation has suggested that the DNO network is already under huge pressure and sufficient capacity will not materialise until post 2031. Notwithstanding that a focus on on-site energy may reduce the reliance on the wider network, the Trust are a major energy consumer and there may be instances where on-site energy generation is not sufficient.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Amend the policy to reflect that the NHS allows reasonable derogation where overriding healthcare demands dictate.</p> <p>The Trust request more a more robust response to potential mitigation when on-site energy generation is not sufficient; this could be captured in Policy W11.</p>
<b>What is your suggested wording or text for the policy?</b>	-
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	No

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Helen Dawson
<b>Personal reference number</b>	ANON-AQTS-32ZJ-2
<b>Full reference number</b>	ANON-AQTS-32ZJ-2/1/CN3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Yet again I am stuck in a doom loop on this form. This may not be in the right section but I'm putting it here as the form tells me "an answer is required". There is no analysis of the local housing stock for energy retrofit measures. For example Victorian terraced homes cannot have cavity wall insulation and internal or external cladding is unlikely to be an acceptable solution. Most of the assets that will be here in 2040 already exist. Many homes are unsuitable for heat pumps and the need for an internal hot water tank is an important consideration for residents giving up precious living space. These aspects need to be thought through. Other blind spots: the size of the grid needs to double - there is no consideration of pylons, substations, and infrastructure required. Each heat pump, solar panel, electrification of a property puts further burden on the local grid. And need's infrastructure.</p> <p>The fair way of addressing this would be an energy infrastructure levy on commercial developers. Otherwise, the lowest income houses will adapt to the energy transition by stopping heating their homes.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Yet again I am stuck in a doom loop on this form. This may not be in the right section but I'm putting it here as the form tells me "an answer is required". There is no analysis of the local housing stock for energy retrofit measures. For example Victorian terraced homes cannot have cavity wall insulation and internal or external cladding is unlikely to be an acceptable solution. Most of the assets that will be here in 2040 already exist. Many homes are unsuitable for heat pumps and the need for an internal hot water tank is an important consideration for residents giving up precious living space. These aspects need to be thought through. Other blind spots: the size of the grid needs to double - there is no consideration of pylons, substations, and infrastructure required. Each heat pump, solar panel, electrification of a property puts further burden on the local grid. And need's infrastructure.</p> <p>The fair way of addressing this would be an energy infrastructure levy on commercial developers. Otherwise, the lowest income houses will adapt to the energy transition by stopping heating their homes.</p>
<b>What is your suggested wording or text for the policy?</b>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Shirlene Oh
<b>Personal reference number</b>	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust
<b>Full reference number</b>	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/12/CN3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Full response on website</p> <p>The Trust note the expansion of detail in this policy concerning achieving BREEAM Excellent certification; this continues to align with NHS Policy. However, the Trust wish to object that the policy has not been amended to reflect that the NHS allows reasonable derogation where overriding healthcare demands dictate.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	<p>Yes</p> <p><a href="#">Letter (Commenting on policies)</a></p>



*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Georgina Cox
<b>Personal reference number</b>	BHLF-AQTS-328Q-7
<b>Full reference number</b>	BHLF-AQTS-328Q-7/9/CN3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>In principle, Gladman support the Council's aspirations to achieve carbon neutrality and the subsequent associated energy efficiency standards in new developments.</p> <p>However, it is considered that several elements of Policy CN3 require further testing through the Local Plan Viability Assessment in order to ensure that they are justified and effective. The policy sets out a policy requirement for all new residential dwellings to demonstrate net-zero operational carbon. The Net Zero Carbon Targets Evidence Base report by Elementa, Currie &amp; Brown and Etude stated the assumed extra-over costs are 5.8% for these housing schemes. Gladman note the clear sensitivity around the cost increase for such developments and suggest the need for further sensitivity testing as part of the viability study. With costs that vary significantly more than the aforementioned figures, further consideration of its impact on viability will need to be assessed.</p> <p>It is vital for the Local Plan to be compliant with national policy. The written ministerial statement (WMS) published on the 13th of December 2023 states in order to meet deliverable net zero homes, additional costs are needed into building new homes which adds complexity and undermines the economies of scale. The WMS then goes on to mention that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale.</p> <p>Gladman therefore suggest in order to comply with the WMS requirements that further evidence is required to show how these developments will be viable and not restrict the Council's ability to deliver a sufficient supply of market and affordable homes.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Supporting information (commenting on policies and proposed site)</a>

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/11/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Wates acknowledges that in order to meet the Government's aim of net zero emissions by 2050, there is a need to improve the environmental performance of new residential (but also non-residential) forms of construction. To reach these targets, there is clear benefit in standardising an approach to sustainable design and construction across the UK as part of a collective approach.</p> <p>We expect further amendments to building regulations and the new Future Homes Standard to be implemented from 2025. These proposed changes will see new homes being built to standards that reduce CO2 emissions by 75% on current standards from 2025 onwards. Furthermore, Homes built under the Future Homes Standard will be 'zero carbon ready', which means that in the longer-term, no further retrofit work for energy efficiency will be necessary to enable them to become zero carbon homes as the electricity grid continues to decarbonise.</p> <p>The Council will need to reflect on the role that building regulations play in the delivery of new development, and whilst national policy does not prevent local authorities from setting higher ambitions, the Plan is still required to demonstrate that its chosen strategy is deliverable and strikes the appropriate balance of social, economic and environment factors in the aim of achieving sustainable development.</p> <p>Any deviation from national requirements should have been carefully considered in terms of its viability. As far as we can tell from reviewing the Local Plan Viability report, the assumptions regarding additional costs appear reasonable, but will have some effect on deliverability in the short term, and especially on the smaller sites. The Future Homes Hub estimates that the increase in build cost for a full 'fabric first' approach, compared with Part L 2021, is circa £19,200 (17%). Compared with the expected 2025 specification it is circa £13,500 (11%) more.</p>
<b>What modification(s) are necessary to make the</b>	<p>Necessary modification to the Policy</p> <p>The Council will need to keep its viability work under review, to ensure it is robust. Wates</p>

<p><b>policy legally compliant or sound?</b></p>	<p>recommends that the Council reviews the Future Homes Hub work on this matter: Ready for Zero - Evidence to inform the 2025 Future Homes Standard -Task Group Report FINAL- 280223- MID RES.pdf (cdn-website.com)</p> <p>The policy will need to be clear that any requirements and encouragements regarding sustainable construction are subject to site specific viability assessments.</p> <p>The Council will also need to carefully consider how it will monitor (and if necessary enforce) a policy which is directed towards attempting to regulate unregulated energy usage.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (commenting on policies and evidence base)</a></p>

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-3286-C
<b>Full reference number</b>	BHLF-AQTS-3286-C/11/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website  Legally compliant Yes  Positively prepared Yes  Sound No  Justified Yes  Compliant with the duty to cooperate Yes  Effective No  Compliant with national policy Yes</p> <p>Wates acknowledges that in order to meet the Government's aim of net zero emissions by 2050, there is a need to improve the environmental performance of new residential (but also non-residential) forms of construction. To reach these targets, there is clear benefit in standardising an approach to sustainable design and construction across the UK as part of a collective approach.</p> <p>We expect further amendments to building regulations and the new Future Homes Standard to be implemented from 2025. These proposed changes will see new homes being built to standards that reduce CO2 emissions by 75% on current standards from 2025 onwards. Furthermore, Homes built under the Future Homes Standard will be 'zero carbon ready', which means that in the longer-term, no further retrofit work for energy efficiency will be necessary to enable them to become zero carbon homes as the electricity grid continues to decarbonise.</p> <p>The Council will need to reflect on the role that building regulations play in the delivery of new development, and whilst national policy does not prevent local authorities from setting higher ambitions, the Plan is still required to demonstrate that its chosen strategy is deliverable and strikes the appropriate balance of social, economic and environment factors in the aim of achieving sustainable development.</p>

	<p>Any deviation from national requirements should have been carefully considered in terms of its viability. As far as we can tell from reviewing the Local Plan Viability report, the assumptions regarding additional costs appear reasonable, but will have some effect on deliverability in the short term, and especially on the smaller sites. The Future Homes Hub estimates that the increase in build cost for a full ‘fabric first’ approach, compared with Part L 2021, is circa £19,200 (17%). Compared with the expected 2025 specification it is circa £13,500 (11%) more<sup>1</sup>.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Necessary modification to the Policy</p> <p>The Council will need to keep its viability work under review, to ensure it is robust. Wates recommends that the Council reviews the Future Homes Hub work on this matter: Ready for Zero - Evidence to inform the 2025 Future Homes Standard -Task Group Report FINAL- 280223- MID RES.pdf (cdn-website.com)</p> <p>The policy will need to be clear that any requirements and encouragements regarding sustainable construction are subject to site specific viability assessments.</p> <p>The Council will also need to carefully consider how it will monitor (and if necessary enforce) a policy which is directed towards attempting to regulate unregulated energy usage.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (Commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-328G-W
<b>Full reference number</b>	BHLF-AQTS-328G-W/11/CN3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website  Legally compliant Yes  Positively prepared Yes  Sound No  Justified Yes  Compliant with the duty to cooperate Yes  Effective No  Compliant with national policy Yes</p> <p>Wates acknowledges that in order to meet the Government's aim of net zero emissions by 2050, there is a need to improve the environmental performance of new residential (but also non-residential) forms of construction. To reach these targets, there is clear benefit in standardising an approach to sustainable design and construction across the UK as part of a collective approach.</p> <p>We expect further amendments to building regulations and the new Future Homes Standard to be implemented from 2025. These proposed changes will see new homes being built to standards that reduce CO2 emissions by 75% on current standards from 2025 onwards. Furthermore, Homes built under the Future Homes Standard will be 'zero carbon ready', which means that in the longer-term, no further retrofit work for energy efficiency will be necessary to enable them to become zero carbon homes as the electricity grid continues to decarbonise.</p> <p>The Council will need to reflect on the role that building regulations play in the delivery of new development, and whilst national policy does not prevent local authorities from setting higher ambitions, the Plan is still required to demonstrate that its chosen strategy is deliverable and strikes the appropriate balance of social, economic and environment factors in the aim of achieving sustainable development. Any deviation from national requirements should have been carefully considered in terms of its viability. As far as we can tell from reviewing the Local Plan Viability report, the assumptions</p>



	<p>regarding additional costs appear reasonable, but will have some effect on deliverability in the short term, and especially on the smaller sites. The Future Homes Hub estimates that the increase in build cost for a full 'fabric first' approach, compared with Part L 2021, is circa £19,200 (17%). Compared with the expected 2025 specification it is circa £13,500 (11%) more.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The Council will need to keep its viability work under review, to ensure it is robust. Wates recommends that the Council reviews the Future Homes Hub work on this matter: Ready for Zero - Evidence to inform the 2025 Future Homes Standard -Task Group Report FINAL- 280223- MID RES.pdf (cdn-website.com)</p> <p>The policy will need to be clear that any requirements and encouragements regarding sustainable construction are subject to site specific viability assessments. The Council will also need to carefully consider how it will monitor (and if necessary enforce) a policy which is directed towards attempting to regulate unregulated energy usage.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (Commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	CN3
<b>Name of respondent (or client)</b>	Winchester College
<b>Personal reference number</b>	BHLF-AQTS-328K-1
<b>Full reference number</b>	BHLF-AQTS-328K-1/10/CN3
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Previous Representation made by Winchester College – Regulation 18 consultation Winchester College support the principle of the City Council's approach to reduce carbon emissions defined in Policy CN3. However, for clarity, the College requests that the wording of the policy distinguishes between proposals for new development and those for a change of use in recognition that measures to reduce carbon emissions may not be possible on existing buildings or appropriate on listed buildings. WCC Officer Comments in relation to the Regulation 18 consultation Support welcomed and comments noted. Policy CN3 is not intended to apply to the change of use and this point has been made clear in the suggested changes to the wording of this policy. Recommended Response: include the words (excluding conversion and change of use) in Policy CN3 in connection with the LETI energy standards. Representation made by Winchester College – Regulation 19 consultation. Whilst it is acknowledged and supported that under the sub-heading 'all new residential development', the words (excluding conversion and change of use) have been inserted, this wording has not been inserted into the sub-section on 'non-residential development'. It is not clear why 'excluding conversion and change of use' has not been added to this part of the policy.</p> <p>Winchester College reiterate that it might not be possible for existing buildings to meet 'BREEAM Excellent'. Where these buildings are listed, the issue is compounded as retrofitting solutions may have an adverse impact on the significance of the heritage asset or its setting. For clarity, it is suggested that this policy is amended as follows (suggested additional text is underlined:...'Non-residential development (<u>excluding change of use</u>) should meet the BREEAM Excellent standard...'</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Winchester College reiterate that it might not be possible for existing buildings to meet 'BREEAM Excellent'. Where these buildings are listed, the issue is compounded as retrofitting solutions may have an adverse impact on the significance of the heritage asset or its setting. For clarity, it is suggested that this policy is amended as follows (suggested additional text is underlined:...'Non-residential development (<u>excluding change of use</u>) should meet the BREEAM Excellent standard...'</p>
<b>What is your suggested wording or text for the policy?</b>	<p>Winchester College reiterate that it might not be possible for existing buildings to meet 'BREEAM Excellent'. Where these buildings are listed, the issue is compounded as retrofitting solutions may have an adverse impact on the significance of the heritage asset or its setting. For clarity, it is suggested that this policy is</p>

	amended as follows (suggested additional text is underlined:...'Non-residential development ( <u>excluding change of use</u> ) should meet the BREEAM Excellent standard...'
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (commenting on policies)</a> <a href="#">Supporting information (Map - Blackbridge Yard)</a>

**WCC Response.**

Comments noted.

The [Carbon Neutrality and Embodied Carbon Topic Paper](#) has been updated (November 2024).

**WCC Recommended Changes arising from representations:**

No Changes apart from.

[Proposed Modifications](#) agreed with Historic England: paragraph 4.24 and change to the wording of Policy CN3.

Local Plan Reference or document	Policy CN4 Water Efficiency Standards in New Developments		
Total Number of Representations received.			17
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>	
Legally Compliant	12	3	
Sound	9	6	
Complies with Duty to Cooperate	14	1	
<p><b>Summary of Representations</b>  The key point about Policy CN4 is the proposed water efficiency target of 100 litres per person per day. This target is linked with Southern Water’s initiatives to reduce consumption, yet some comments point out that this deviates from the Environment Agency’s recommended 110 litres benchmark for water-stressed regions. The difference between the two standards has raised concern regarding the policy’s alignment with national guidelines and its practicality. While Southern Water and some of the other comments support this water efficiency target, (as this is considered to be crucial for water sustainability/climate challenges) developers and other comments question its feasibility and potential impact on development costs, suggesting that it might not be achievable without incurring additional expenses. Suggestions that there should be a phased approach to the implementation of this policy but it is acknowledged that implementing these changes will require behavioural changes and technological advancements to ensure long-term water resilience.</p>			
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)  <b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/11/CN4</b>  ANON-AQTS-3BSY-T/17/CN4  ANON-AQTS-3B4K-D/2/CN4  <b>ANON-AQTS-32CD-5 - Colden Common Parish Council/11/CN4</b>  ANON-AQTS-32GG-C/3/CN4, ANON-AQTS-32G3-R/2/CN4  <b>ANON-AQTS-32UK-X - Environment Agency/6/CN4</b>  ANON-AQTS-329Q-8/8/CN4, ANON-AQTS-3BQA-Z/3/CN4  <b>ANON-AQTS-327U-A - Southern Water/10/CN4</b>  ANON-AQTS-3BBP-Z/3/CN4  ANON-AQTS-327B-Q/3/CN4  BHLF-AQTS-328Q-7/4/CN4  BHLF-AQTS-328X-E/3/CN4  BHLF-AQTS-3286-C/3/CN4  BHLF-AQTS-328G-W/3/CN4</p>			

BHLF-AQTS-32QQ-Z/3/CN4

**Main issues raised in representations received in regulation 19 consultation.**

- The water efficiency target in Policy CN4 which comes from Southern Water deviates from the Environment Agency's target for water efficiency;
- Developers have raised the issue of the cost of implementing this policy and whether there could be a phased approach; and
- Implementing these changes will require behavioural changes and technological advancements to ensure long-term water resilience and to address concerns over the policy's soundness.

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/11/CN4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan's strategy. Given the challenges we face, there is no other option than to address these head on. Of course, future practice needs to match the good intentions, but whenever there is a perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. The Parish Council supports these policies. Support policies CN1-8 inclusive.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies)</a>

*such as images, tables, or tracked changes, if applicable.*



<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/17/CN4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy aims to reduce water usage, which it must. However, potable water is currently used for everything. Why do we need this for flushing toilet. In the longer, it will be necessary to have different supplies to houses for different usages. All future developments should make sure this is possible.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Winchester Action on the Climate Crisis (WinACC)
<b>Personal reference number</b>	ANON-AQTS-3B4K-D
<b>Full reference number</b>	ANON-AQTS-3B4K-D/2/CN4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	WinACC supports this policy
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/11/CN4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	No comment but could not skip through this section
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Mark Behrendt
<b>Personal reference number</b>	ANON-AQTS-32GG-C
<b>Full reference number</b>	ANON-AQTS-32GG-C/3/CN4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>There is no justification for going below the minimum optional technical standard set out in building regulations. While tighter standards may be implemented in future the HBF believes these should be as a comprehensive and phased approach undertaken through building regulations and not piecemeal through local plans. We recognise that the Ministerial Statement 'Next Stage in Our Long-Term Plan for Housing Update' from December 2023 states that there are situations where a lower standard can be set but this is only where in areas of serious water stress "where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes". This would apply in area such as North Sussex where the water any additional abstraction for new development is considered to have a negative impact on the status of a protected habitat. In order for local plans to progress and new development to be granted planning permission then a lower standard alongside offsetting has been required. This is not the case in West Suffolk and as such the proposed standard is inconsistent with national policy.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	<p>Yes</p> <p><a href="#">Form (copy of form - refers to letter)</a></p> <p><a href="#">Letter (Commenting on policies and evidence base)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	KW Forum Limited
<b>Personal reference number</b>	ANON-AQTS-32G3-R
<b>Full reference number</b>	ANON-AQTS-32G3-R/2/CN4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Kennedy Wilson responded to the Regulation 18 draft Local Plan consultation and were given the reference ANON-KSAR-NKFC-K. The representation broadly supported draft Policy CN4 but asked that the policy be amended to insert the following wording criteria ii. of Policy CN4: “Any refurbishments and other non-domestic development should be designed to meet BREEAM water efficiency credits unless it can be demonstrated that it is not feasible or viable”.</p> <p>The Council’s response to seems to acknowledge that there may be circumstances where it is necessary to make a case to allow deviation from the approach set out in draft policy CN4. The Council states: “if this is not possible [to meet policy requirements], it will be necessary for applicants to demonstrate this in the planning application.”</p> <p>Given the acknowledgement that such instances may exist, we do not see why the proposed policy couldn’t be amended to reflect this, and to identify that applicant’s are able to make the case. As worded, the policy simply states the requirements, but makes no acknowledgement at all of what to do as an applicant if the requirements cannot be met. The simple amendment to policy, which seems to align with how the Council would apply the policy in practical terms, would seem a reasonable amendment to ensure the policy is easily read and more flexibly applied.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Kennedy Wilson responded to the Regulation 18 draft Local Plan consultation and were given the reference ANON-KSAR-NKFC-K. The representation broadly supported draft Policy CN4 but asked that the policy be amended to insert the following wording criteria ii. of Policy CN4: “Any refurbishments and other non-domestic development should be designed to meet BREEAM water efficiency credits unless it can be demonstrated that it is not feasible or viable”. The Council’s response to seems to acknowledge that there may be circumstances where it is necessary to make a case to allow deviation from the approach set out in draft policy CN4. The Council states: “if this is not possible [to meet policy requirements], it will be necessary for applicants to demonstrate this in the planning application.”</p> <p>Given the acknowledgement that such instances may exist, we do not see why the proposed policy couldn’t be amended to reflect this, and to identify that applicant’s are able to make the case. As worded, the policy</p>

	<p>simply states the requirements, but makes no acknowledgement at all of what to do as an applicant if the requirements cannot be met. The simple amendment to policy, which seems to align with how the Council would apply the policy in practical terms, would seem a reasonable amendment to ensure the policy is easily read and more flexibly applied.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Kennedy Wilson responded to the Regulation 18 draft Local Plan consultation and were given the reference ANON-KSAR-NKFC-K. The representation broadly supported draft Policy CN4 but asked that the policy be amended to insert the following wording criteria ii. of Policy CN4: “Any refurbishments and other non-domestic development should be designed to meet BREEAM water efficiency credits unless it can be demonstrated that it is not feasible or viable”. The Council’s response to seems to acknowledge that there may be circumstances where it is necessary to make a case to allow deviation from the approach set out in draft policy CN4. The Council states: “if this is not possible [to meet policy requirements], it will be necessary for applicants to demonstrate this in the planning application.” Given the acknowledgement that such instances may exist, we do not see why the proposed policy couldn’t be amended to reflect this, and to identify that applicant’s are able to make the case. As worded, the policy simply states the requirements, but makes no acknowledgement at all of what to do as an applicant if the requirements cannot be met. The simple amendment to policy, which seems to align with how the Council would apply the policy in practical terms, would seem a reasonable amendment to ensure the policy is easily read and more flexibly applied.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (covering letter)</a>  <a href="#">Supporting information (Employment Land matters)</a>  <a href="#">Supporting documents (comments on policies)</a></p>

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Anna Rabone
<b>Personal reference number</b>	ANON-AQTS-32UK-X - Environment Agency
<b>Full reference number</b>	ANON-AQTS-32UK-X - Environment Agency/6/CN4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We are supportive of this policy, especially as the district is within a 'water stressed' area ( <a href="https://www.gov.uk/government/publications/water-stressed-areas-2021-classification">https://www.gov.uk/government/publications/water-stressed-areas-2021-classification</a> ).
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	No modifications necessary.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No



<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/8/CN4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Bloor Homes acknowledges the issues faced in Winchester district around water stress. However, the proposed water standard of 100 litres per person per day (l/p/d) is inconsistent with the Environment Agency's guidelines on Water Efficiency and Planning, published 18/08/2023, within the evidence base. The Environment Agency advises that local planning authorities in the Solent and South Downs should ensure that new residential developments achieve an average water consumption of at least 110 l/p/d. While Southern Water may be promoting a lower benchmark, this does not provide adequate justification or evidence for deviating from the Environment Agency's recommendations. Such evidence does not appear to be on the council's local plan evidence webpage. As such the draft policy is not justified.</p> <p>The practical implications of achieving such a standard should not be underestimated and whilst Bloor Homes encourages water efficiency in new development, there is a need for a wider behavioural shift to support such a move which is beyond the remit of the development industry.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Bloor Homes acknowledges the issues faced in Winchester district around water stress. However, the proposed water standard of 100 litres per person per day (l/p/d) is inconsistent with the Environment Agency's guidelines on Water Efficiency and Planning, published 18/08/2023, within the evidence base. The Environment Agency advises that local planning authorities in the Solent and South Downs should ensure that new residential developments achieve an average water consumption of at least 110 l/p/d. While Southern Water may be promoting a lower benchmark, this does not provide adequate justification or evidence for deviating from the Environment Agency's recommendations. Such evidence does not appear to be on the council's local plan evidence webpage. As such the draft policy is not justified.</p> <p>The practical implications of achieving such a standard should not be underestimated and whilst Bloor Homes encourages water efficiency in new development, there is a need for a wider behavioural shift to support such a move which is beyond the remit of the development industry.</p>
<b>What is your suggested wording or text for the policy?</b>	<p>Bloor Homes acknowledges the issues faced in Winchester district around water stress. However, the proposed water standard of 100 litres per person per day (l/p/d) is inconsistent with the Environment Agency's guidelines on Water Efficiency and Planning, published 18/08/2023, within the evidence base. The</p>

	<p>Environment Agency advises that local planning authorities in the Solent and South Downs should ensure that new residential developments achieve an average water consumption of at least 110 l/p/d. While Southern Water may be promoting a lower benchmark, this does not provide adequate justification or evidence for deviating from the Environment Agency's recommendations. Such evidence does not appear to be on the council's local plan evidence webpage. As such the draft policy is not justified.</p> <p>The practical implications of achieving such a standard should not be underestimated and whilst Bloor Homes encourages water efficiency in new development, there is a need for a wider behavioural shift to support such a move which is beyond the remit of the development industry.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map and evidence base)</a>  <a href="#">Vision document (Land At Mill Lane, Wickham)</a></p>

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/3/CN4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>The Policy sets out that “Developments will be required to meet a high standards of water efficiency: i. Residential developments should be designed to achieve a maximum water capacity use of 100 litres/person/day from mains/private water supply in order to help manage the demand for water unless it can be demonstrated that this is not feasible”. Bloor object to the proposed potable water consumption figure of 100 litres per person, per day quoted in Policy CN4. As expressed by the HBF in their representations the lower water standard of 100 l/p/pd is not consistent with national policy which states that 110 l/p/d is sufficient in water stressed areas. While Bloor recognise that Southern Water are promoting a lower figure that is insufficient justification to depart from national policy and therefore the policy cannot be deemed sound. Policy CN4, criteria ii requires “Any refurbishments and other non-domestic development would be required to meet BREEAM water efficiency credits”. Savills Earth on behalf of Bloor, request that further details is provided on how many credits applicants are required to target to comply with the above policy.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>The Policy sets out that “Developments will be required to meet a high standards of water efficiency: i. Residential developments should be designed to achieve a maximum water capacity use of 100 litres/person/day from mains/private water supply in order to help manage the demand for water unless it can be demonstrated that this is not feasible”. Bloor object to the proposed potable water consumption figure of 100 litres per person, per day quoted in Policy CN4. As expressed by the HBF in their representations the lower water standard of 100 l/p/pd is not consistent with national policy which states that 110 l/p/d is sufficient in water stressed areas. While Bloor recognise that Southern Water are promoting a lower figure that is insufficient justification to depart from national policy and therefore the policy cannot be deemed sound.</p>

	<p>Policy CN4, criteria ii requires “Any refurbishments and other non-domestic development would be required to meet BREEAM water efficiency credits”. Savills Earth on behalf of Bloor, request that further details is provided on how many credits applicants are required to target to comply with the above policy.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>The Policy sets out that “Developments will be required to meet a high standards of water efficiency: i. Residential developments should be designed to achieve a maximum water capacity use of 100 litres/person/day from mains/private water supply in order to help manage the demand for water unless it can be demonstrated that this is not feasible”. Bloor object to the proposed potable water consumption figure of 100 litres per person, per day quoted in Policy CN4. As expressed by the HBF in their representations the lower water standard of 100 l/p/pd is not consistent with national policy which states that 110 l/p/d is sufficient in water stressed areas. While Bloor recognise that Southern Water are promoting a lower figure that is insufficient justification to depart from national policy and therefore the policy cannot be deemed sound. Policy CN4, criteria ii requires “Any refurbishments and other non-domestic development would be required to meet BREEAM water efficiency credits”. Savills Earth on behalf of Bloor, request that further details is provided on how many credits applicants are required to target to comply with the above policy.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on Policies &amp; Evidence Base)</a></p> <p><a href="#">Supporting document 1 (South Winchester Vision Document)</a></p> <p><a href="#">Supporting document 2 (Response to the delivery of housing)</a></p> <p><a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a></p> <p><a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a></p> <p><a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a></p>

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/10/CN4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Southern Water fully supports this policy as it aligns with our Target 100 program which aims to help our existing customers to reduce their water consumption to 100 litres per person per day, whilst we work to reduce network leakage by 40% by 2040. Establishing a 100l/p/d standard for new development will contribute to a more comprehensive approach to driving down water consumption, without which it will be harder to achieve meaningful savings.</p> <p>The supporting text to this policy helpfully highlights the challenge we collectively face in Hampshire in securing a resilient water supply for the future in the face of climate change, population growth and reductions in abstractions from the county's rivers. Promoting water efficiency in new development is a critical step to addressing this, but new water sources also need to be found as part of the solution to maintaining essential supplies to both existing and new homes and businesses.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b>	Yes <a href="#">Supporting Document (Commenting on policies)</a>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Andrew Uwins
<b>Personal reference number</b>	ANON-AQTS-3BBP-Z
<b>Full reference number</b>	ANON-AQTS-3BBP-Z/3/CN4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Hazeley object to the proposed potable water consumption figure of 100 litres per person, per day quoted in Policy CN4. As expressed by the HBF in their representations the lower water standard of 100 l/p/pd is not consistent with national policy which states that 110 l/p/d is sufficient in water stressed areas and therefore the policy cannot be deemed sound.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies - includes pictures)</a>

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Alice Lack
<b>Personal reference number</b>	ANON-AQTS-327B-Q
<b>Full reference number</b>	ANON-AQTS-327B-Q/3/CN4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Welbeck object to the proposed potable water consumption figure of 100 litres per person, per day quoted in Policy CN4. As expressed by the HBF in their representations the lower water standard of 100 l/p/pd is not consistent with national policy which states that 110 l/p/d is sufficient in water stressed areas and therefore the policy cannot be deemed sound.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on Policies)</a>



<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Georgina Cox
<b>Personal reference number</b>	BHLF-AQTS-328Q-7
<b>Full reference number</b>	BHLF-AQTS-328Q-7/4/CN4
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Gladman note that Policy CN4 seeks to employ a requirement whereby developments will be required to meet a high standard of water efficiency and for residential developments to be designed to achieve a maximum water capacity use of 100 litres per person, per day. It is noted that this a higher standard than currently required in the adopted development plan and aligns with Southern Water's 'T100 Target'. While the policy is aspirational and seeks to support supply across a water stressed area, it is not apparent how such measures would be implemented and managed. Further guidance in the form of an SPD might help support and provide clarity on such a policy requirement.</p> <p>The Solent and South Downs (SSD) Position on Water Efficiency and Planning which was published in 2023 states authorities within the SSD area should 'incorporate policies within their local plans that provide for new residential developments to at least reach an average water consumption of 110 litres per person per day (l/p/d).' The document further goes on to additionally 'support local plan policies that go beyond 110 l/p/d.' While development over 110 lpppd is supported, 100 lpppd appears quite a stringent target. With the increased costs associated with Policy CN4, it is important to note that costs will be further increased to retrofit developments to increase water efficiency standards.</p> <p>The viability assessment explains the restriction to 100 litres per person per day on the basis that the Council can appropriately demonstrate that the district is within an area of water stress. The report further demonstrates the overall cost impact for this requirement to be nominal meaning no explicit cost assumptions are required as of yet. Gladman suggest further evidence to be provided demonstrating the viability of development with a water efficiency below 100 lpppd and so to ensure development is not to be restricted.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Supporting information (commenting on policies and proposed site)</a>

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/3/CN4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Wates understands the water management challenges in the area, and that the South East of England is a water stressed area. Targets of 110l per day, and 105l per day have been achieved in developments and as such the new target of 100l per day is 'sound' so long as it is approached in a collaborative way between applicants, the Council, and Southern Water. Punitive conditions should not be applied, to development consents, which could stifle development, rather a proactive and knowledge sharing approach should be sought which introduces new technologies in a phased manner.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on policies and evidence base)</a>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-3286-C
<b>Full reference number</b>	BHLF-AQTS-3286-C/3/CN4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website</p> <p>Legally compliant Yes  Positively prepared Yes  Sound Yes  Justified Yes  Compliant with the duty to cooperate Yes  Effective Yes  Compliant with national policy Yes</p> <p>Wates understands the water management challenges in the area, and that the South East of England is a water stressed area. Targets of 110l per day, and 105l per day have been achieved in developments and as such the new target of 100l per day is 'sound' so long as it is approached in a collaborative way between applicants, the Council, and Southern Water. Punitive conditions should not be applied, to development consents, which could stifle development, rather a proactive and knowledge sharing approach should be sought which introduces new technologies in a phased manner.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies)</a>

<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-328G-W
<b>Full reference number</b>	BHLF-AQTS-328G-W/3/CN4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website</p> <p>Legally compliant Yes  Positively prepared Yes  Sound Yes Justified Yes  Compliant with the duty to cooperate Yes  Effective Yes  Compliant with national policy Yes</p> <p>Wates understands the water management challenges in the area, and that the South East of England is a water stressed area. Targets of 110l per day, and 105l per day have been achieved in developments and as such the new target of 100l per day is 'sound' so long as it is approached in a collaborative way between applicants, the Council, and Southern Water. Punitive conditions should not be applied, to development consents, which could stifle development, rather a proactive and knowledge sharing approach should be sought which introduces new technologies in a phased manner.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies)</a>



<b>Policy/Evidence base document</b>	CN4
<b>Name of respondent (or client)</b>	Lorna Selby
<b>Personal reference number</b>	BHLF-AQTS-32QQ-Z
<b>Full reference number</b>	BHLF-AQTS-32QQ-Z/3/CN4
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>In addition, we are pleased to see the requirement for new developments to meet a water efficiency standard of 100 litres per person per day in Policy CN4: Water Efficiency Standards in New Developments. This water efficiency standard is in line with the Future Homes Hub review, which recommends a target of 100 litres per person per day by 2030, and 90 in water stressed areas.</p> <p>The review recommends that this should be tightened to 90 as standard by 2035 and 80 litres per person per day in water stressed areas. The feasibility of building to these standards is evidenced in detail, building on previous research and evidence behind such specifications in the former Code for Sustainable Homes.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on policies)</a>

*However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

Local Plan Reference or document	Policy CN5 Renewable and Low Carbon Energy Schemes	
Total Number of Representations received.	10	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	7	0
Sound	4	3
Complies with Duty to Cooperate	7	0
<p><b>Summary of Representations</b></p> <p>The key concerns are balancing the need for green energy renewable energy development with other priorities. There is a need to ensure that renewable projects do not negatively impact military operations or aviation safety, with the Ministry of Defence expressing the need for clarity in policy CN5 to protect national security. Visual impact and environmental protection are also highlighted, with clearer criteria to prevent subjective judgements that might hinder viable projects. Concerns were expressed regarding the language in the policy, like “significant impact,” which is considered to prevent renewable energy developments. Other concerns relate to covering agricultural land with solar panels and the potential negative effects that this could have on food production and local carbon footprints. There was support for on-site renewable energy generation which could minimise the dependency on larger renewable energy scheme but there were also concerns about the capacity of the energy grid network to be able to cope with this change. There were comments about the urgency of the need for renewable energy projects in order to help with energy security and to address the increase cost of living. Overall, there was support renewable energy generation but this needs to be balanced against environmental, operational, and security challenges.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p><b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/70/CN5</b></p> <p>ANON-AQTS-3BSY-T/93/CN5</p> <p>ANON-AQTS-3BR7-Q/1/CN5</p> <p>ANON-AQTS-3B4K-D/8/CN5</p> <p><b>ANON-AQTS-32CD-5 - Colden Common Parish Council/49/CN5</b></p> <p><b>ANON-AQTS-32UK-X - Environment Agency/19/CN5</b></p> <p>ANON-AQTS-32TW-9/8/CN5</p> <p><b>BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/20/CN5</b></p> <p><b>BHLF-AQTS-32YM-4 - Defence Infrastructure Organisation/3/CN5</b></p>		
<p><b>Main issues raised in representations received in regulation 19 consultation.</b></p> <ul style="list-style-type: none"> <li>The need to balance the need for green energy renewable energy development with other priorities;</li> </ul>		

- Ensure that renewable projects do not negatively impact military operations or aviation safety;
- Visual impact and environmental protection with clearer criteria to prevent subjective judgements that might hinder viable projects;
- Concerns were raised about covering agricultural land with solar panels and the potential negative effects that this could have on food production and local carbon footprints;
- On-site renewable energy generation is encouraged in order to minimise dependency on larger renewable energy scheme but there were also concerns about the capacity of the energy grid network to be able to cope with this change; and
- The need for energy projects in order to help with energy security and to address increase cost of living.

<b>Policy/Evidence base document</b>	CN5
<b>Name of respondent (or client)</b>	Guy Robinson
<b>Personal reference number</b>	ANON-AQTS-32U8-B - Historic England
<b>Full reference number</b>	
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Naturally we welcome policy support for heritage conservation; but also we wish to support renewable energy. Set in that context, we query the deliverability of a policy approach that requires no harm to heritage significance. We wonder if “significant” should be added before “adverse”. Alternatively, we note that policy CN6 refers to no “unacceptable” impact on heritage significance.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	“iv. That there are no significant adverse impacts on the significance of heritage assets (including the contribution to that significance made by their setting)”
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Email correspondence (between officers and Historic England)</a> <a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a>



<b>Policy/Evidence base document</b>	CN5
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/70/CN5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan's strategy. Given the challenges we face, there is no other option than to address these head on. Of course, future practice needs to match the good intentions, but whenever there is a perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. The Parish Council supports these policies. Support policies CN1-8 inclusive.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies)</a>



*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN5
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/93/CN5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	However, it is better to install solar panels on roofs, rather than on agricultural land.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN5
<b>Name of respondent (or client)</b>	Bill Gunyon
<b>Personal reference number</b>	ANON-AQTS-3BR7-Q
<b>Full reference number</b>	ANON-AQTS-3BR7-Q/1/CN5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy CN5 (and associated text) is supportive but fails to convey the heightened urgency of renewable energy schemes. These now deliver infrastructure that is critical to national energy security and cost of living, as well as climate change. And they need to be accelerated in light of the new government's deadline for grid decarbonisation (2030).</p> <p>This latter policy announcement was too late for consideration in this Plan. But its deliverables are due to be in place before the Plan's first review. As this quandary applies to all Local Plans currently nearing completion, I raise the point as a potential issue, rather than propose any wording. A similar timing issue relates to the recent removal of the NPPF footnote that has effectively blocked onshore wind plans in England. I have suggested below a simple way of restoring reference to wind potential, on the grounds that it shouldn't have been excluded from the draft.</p> <p>Para 4.40 asserts that wind potential is confined to ineligible locations inside the South Downs National Park, citing a 2008 Study. This is a fundamental error of misrepresentation. In offering a positive conclusion about the potential for wind, page 24 of the Study clearly excludes the "planned National Park" (as it was then) verified by the map displaying sites of wind potential (p25). The new Local Plan should register this potential. There is a further citation issue within para 4.40. It refers to "target potential for renewables equating to 17% of current energy demand., again by reference to the 2008 Study. In resisting a challenge to this figure in the Regulation 18 consultation, the Officer comments that "the landscape and topography conclusions will not have altered since 2008" (see comments on Policy CN5 page 6). This overlooks that the Study considered solar technology for "roof top potential only," excluding ground-based solar farms as financially unviable (page 14 in Study).</p> <p>Events have made nonsense of this exclusion. Solar farms now contribute 85% of electricity generation located in Winchester District and have potential to deliver a target in excess of local demand for electricity. This upheaval is the result of economics (falling price of solar). Landscape aand topography have been irrelevant.</p>

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Para 4.40 should limit its source material to the more recent 2022 study by Winchester Action on the Climate Crisis (WinACC).</p> <p>In quoting summaries from the WinACC report, para 4.41 should restore the bullet point about wind potential. The small print footnote to 4.41 dates the report as 2021 when it should be 2022.</p> <p>In the Evidence Base section of this consultation, I question the inclusion of the 2008 Study and suggest more recent sources as substitutes.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>4.40: The generation of renewable and low carbon energy will help to contribute to national targets and the council's climate emergency. A 2022 Renewable Energy Study by Winchester Action on the Climate Crisis showed that there is potential for local renewable generation to match local consumption of electricity in a future net zero scenario. The Study suggested that the greatest potential for renewable and low carbon energy schemes in the part of the district that is located outside of the South Downs National Park is from solar energy generation, alongside a contribution from wind turbines.</p> <p>4.41 (add this further bullet point, quoted from the Study): "It will be necessary to activate the potential for wind energy that exists within the District."</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

<b>Policy/Evidence base document</b>	CN5
<b>Name of respondent (or client)</b>	Winchester Action on the Climate Crisis (WinACC)
<b>Personal reference number</b>	ANON-AQTS-3B4K-D
<b>Full reference number</b>	ANON-AQTS-3B4K-D/8/CN5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Criterion (v) is not effective as it does not provide a clear measure for assessing the visual impact of development proposals for the generation of renewable and low carbon energy. "Significant impact" should be replaced as it is too broad a measurement. It relies on subjective judgement and would allow policy challenge from a very low bar of assessment. It would allow personal aesthetic judgement to block appropriate and viable renewable and low carbon schemes from coming forward.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Criterion (v) should require proposals to demonstrate that there would be no measurable harm to the character and appearance of protected landscapes.
<b>What is your suggested wording or text for the policy?</b>	(v) That there is no measurable harm to the landscape character or visual amenity of nationally designated landscapes, to be demonstrated by undertaking a Landscape Visual Appraisal or a Landscape Visual Impact Assessment.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN5
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/49/CN5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	No comment but could not skip through this section
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN5
<b>Name of respondent (or client)</b>	Anna Rabone
<b>Personal reference number</b>	ANON-AQTS-32UK-X - Environment Agency
<b>Full reference number</b>	ANON-AQTS-32UK-X - Environment Agency/19/CN5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We support this policy, particularly for risk of fire and the potential run off in Source Protection Zones. Adequate measures should be in place at battery energy storage systems sites to prevent fire water runoff from contaminating the local environment. Development should be in line with the Planning Practice Guidance for Renewable and low carbon energy.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	No modifications are necessary.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No



<b>Policy/Evidence base document</b>	CN5
<b>Name of respondent (or client)</b>	Judith Anne Polak
<b>Personal reference number</b>	ANON-AQTS-32TW-9
<b>Full reference number</b>	ANON-AQTS-32TW-9/8/CN5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Covering valuable agricultural land with solar panels will not reduce our carbon footprint. Supermarkets are full of products flown in from all over the world which could easily be grown in the UK. The conflict in Ukraine has highlighted the folly of being reliant on overseas production.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN5
<b>Name of respondent (or client)</b>	Shirlene Oh
<b>Personal reference number</b>	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust
<b>Full reference number</b>	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/20/CN5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Full response on website</p> <p>The Trust remain likely to support any renewable and low carbon energy scheme arising. The Trust has a plan for decarbonisation of the RHCH site based on electrification and renewables. Investigation has suggested that the DNO network is already under huge pressure and sufficient capacity will not materialise until post 2031. Notwithstanding that a focus on on-site energy may reduce the reliance on the wider network, the Trust are a major energy consumer and there may be instances where on-site energy generation is not sufficient. The Trust therefore request more a more robust response to potential mitigation; this could be captured in Policy W11.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	Yes <a href="#">Letter (Commenting on policies)</a>

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN5
<b>Name of respondent (or client)</b>	Debbie Baker
<b>Personal reference number</b>	BHLF-AQTS-32YM-4 - Defence Infrastructure Organisation
<b>Full reference number</b>	BHLF-AQTS-32YM-4 - Defence Infrastructure Organisation/3/CN5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The MOD note proposed Policy CN5 Renewable and Low Carbon Energy Schemes. The MOD has, in principle, no objection to any renewable energy development, though some infrastructure enabling renewable energy production, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace surrounding military aerodromes, or impede the operation of safeguarded defence technical installations. In addition, where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations potentially resulting in detriment to aviation safety and operational capability.</p> <p>The MOD request that the wording of Policy CN5 is broadened to inform developers that only those applications for development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported. Within any new Local Plan, policies and the reasoned justification supporting them should, ideally, refer to the presence of safeguarding zones and/or provide a developer with an indication as to potential limitations that might apply to certain development types. In order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD safeguarded zones, it is requested that the Regulation 19 Winchester District Council's Local Plan Proposed Submission contains policy wording that makes clear that only those applications for development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported - see additional info in PDF</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (commenting on policies)</a>  <a href="#">Supporting information (commenting on policies and safeguarding zones)</a></p>

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed Modifications](#) agreed with Historic England regarding changing the wording of criterion iv of Policy CN5.

Local Plan Reference or document	Policy CN6 Micro Energy Generation Schemes	
Total Number of Representations received.	8	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	6	0
Sound	5	1
Complies with Duty to Cooperate	6	0
<p><b>Summary of Representations</b></p> <p>There are concerns around the prioritisation of historical significance versus climate change initiatives. Around 43% of comments call for a shift in focus from preserving historical importance towards embracing renewable energy generation and climate action. Trusts and other stakeholders are encouraging amendments to the wording of the policy which is considered to have too much emphasis on historical concerns, suggesting that integrating ground source heat pumps, air source heat pumps, and solar energy which can promote healthier environments. However, there is a shared concern about the ability of the Distribution Network Operator network to support this shift before 2031. Whilst renewable energy integration is considered to be critical, the wording in the policy still places considerable weight on historical preservation, potentially constraining the advancement of green energy technologies. This reflects the broader uncertainty on how best to reconcile heritage conservation with the urgent need for environmental reforms.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p><b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/48/CN6</b></p> <p>ANON-AQTS-3BSY-T/61/CN6</p> <p>ANON-AQTS-3B4K-D/7/CN6</p> <p><b>ANON-AQTS-32CD-5 - Colden Common Parish Council/35/CN6</b></p> <p><b>ANON-AQTS-32UK-X - Environment Agency/14/CN6</b></p> <p><b>ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/14/CN6</b></p> <p><b>BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/14/CN6</b></p>		
<p><b>Main issues raised in representations received in regulation 19 consultation.</b></p> <ul style="list-style-type: none"> <li>• Concerns relate to the prioritisation of historical significance versus climate change initiatives and the need to embrace renewable energy generation;</li> <li>• There is considered to be too much emphasis on the historic environment.</li> <li>• There is shared concern about the ability of the Distribution Network Operator network to support this shift before 2031; and</li> <li>• Uncertainty on how best to reconcile heritage conservation with the urgent need for environmental reforms.</li> </ul>		

<b>Policy/Evidence base document</b>	CN6
<b>Name of respondent (or client)</b>	Guy Robinson
<b>Personal reference number</b>	ANON-AQTS-32U8-B - Historic England
<b>Full reference number</b>	
<b>Legally compliant?</b>	
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Email correspondence (between officers and Historic England)</a> <a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a>



<b>Policy/Evidence base document</b>	CN6
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/48/CN6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan's strategy. Given the challenges we face, there is no other option than to address these head on. Of course, future practice needs to match the good intentions, but whenever there is a perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. The Parish Council supports these policies. Support policies CN1-8 inclusive.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies)</a>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN6
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/61/CN6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	It is good to install such systems on land that is already developed.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN6
<b>Name of respondent (or client)</b>	Winchester Action on the Climate Crisis (WinACC)
<b>Personal reference number</b>	ANON-AQTS-3B4K-D
<b>Full reference number</b>	ANON-AQTS-3B4K-D/7/CN6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We support this policy
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN6
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/35/CN6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	No comment but could not skip through this section
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN6
<b>Name of respondent (or client)</b>	Anna Rabone
<b>Personal reference number</b>	ANON-AQTS-32UK-X - Environment Agency
<b>Full reference number</b>	ANON-AQTS-32UK-X - Environment Agency/14/CN6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	ADVISORY NOTE. Closed loop ground source heat pumps do not require any regulation, whereas the Environment Agency regulates open loop systems. Open loop systems require various consents. Further information can be found here: <a href="https://www.gov.uk/guidance/open-loop-heat-pump-systems-permits-consents-and-licences">https://www.gov.uk/guidance/open-loop-heat-pump-systems-permits-consents-and-licences</a>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	No modifications are necessary.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN6
<b>Name of respondent (or client)</b>	Hampshire Hospitals NHS Foundation Trust
<b>Personal reference number</b>	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust
<b>Full reference number</b>	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/14/CN6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Ground Source, Air Source and Solar remain expected to play a vital part in the Trusts own plans to decarbonise existing sites and contributing to creating health environments. The Trust welcomes the removal of the reference to avoidance of impacts on the architectural significance of buildings. Nevertheless, the Trust remains concerned that the wording of this policy continues to put undue emphasis on historic significance. Investigations suggest that the DNO network is already under huge pressure and sufficient capacity to support such a shift will not materialise until post 2031. The Trust remain concerned that this has not been given sufficient weight by WCC. For these reasons, while the Trust support a move to Ground Source, Air Source and Solar, the Trust objects to the wording of this policy as written.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Amend the wording to recognise that renewable energy may trump historical significance in some circumstances. Adjust or add supporting wording to note that the capacity of the DNO network may dictate or influence energy options.
<b>What is your suggested wording or text for the policy?</b>	-
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	No

*However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*



<b>Policy/Evidence base document</b>	CN6
<b>Name of respondent (or client)</b>	Shirlene Oh
<b>Personal reference number</b>	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust
<b>Full reference number</b>	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/14/CN6
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Full response on website</p> <p>Ground Source, Air Source and Solar remain expected to play a vital part in the Trusts own plans to decarbonise existing sites and contributing to creating health environments. The Trust welcomes the removal of the reference to avoidance of impacts on the architectural significance of buildings. Nevertheless, the Trust remains concerned that the wording of this policy continues to put undue emphasis on historic significance. Investigations suggest that the DNO network is already under huge pressure and sufficient capacity to support such a shift will not materialise until post 2031. The Trust remain concerned that this has not been given sufficient weight by WCC. For these reasons, while the Trust support a move to Ground Source, Air Source and Solar, the Trust objects to the wording of this policy as written.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	Yes <a href="#">Letter (Commenting on policies)</a>

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

[Proposed Modifications](#) agreed with Historic England regarding changing the wording of criterion iv of Policy CN6.

Local Plan Reference or document	Policy CN7 Energy Storage	
Total Number of Representations received.	5	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	4	0
<b>Sound</b>	3	1
<b>Complies with Duty to Cooperate</b>	4	0
<p><b>Summary of Representations</b></p> <p>There is support for prioritising climate change adaptation and mitigation within policies, particularly policies CN1-8. However, there are concerns about the restrictive wording of criterion (iv) in policy CN7, which it is considered may hinder large-scale installations and conflict with climate emergency objectives. This issue presents a challenge in effectively embedding climate priorities in the policy framework. Some of the responses request that the wording of Policy CN7 is revised to promote a better alignment with sustainability goals. Additionally, the importance of co-locating infrastructure points towards the need for innovative policies that support sustainable development practices without compromising environmental standards. There is the need for policies that support or incentivise the combined use of space for energy storage.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p><b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/14/CN7</b></p> <p>ANON-AQTS-3BSY-T/21/CN7</p> <p>ANON-AQTS-3B4K-D/3/CN7</p> <p><b>ANON-AQTS-32CD-5 - Colden Common Parish Council/15/CN7</b></p>		
<p><b>Main issues raised in representations received in regulation 19 consultation.</b></p> <ul style="list-style-type: none"> <li>• Support for prioritising climate change adaptation and mitigation within policies, particularly policies CN1-8;</li> <li>• Concerns about the restrictive wording of criterion (iv) in policy CN7, which it is considered may hinder large-scale installations and conflict with climate emergency objectives;</li> <li>• Some of the responses request that the wording of Policy CN7 is revised to promote a better alignment with sustainability goals; and</li> <li>• There is the need for policies that support or incentivise the combined use of space for energy storage.</li> </ul>		

<b>Policy/Evidence base document</b>	CN7
<b>Name of respondent (or client)</b>	Guy Robinson
<b>Personal reference number</b>	ANON-AQTS-32U8-B - Historic England
<b>Full reference number</b>	
<b>Legally compliant?</b>	
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Email correspondence (between officers and Historic England)</a> <a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a>

<b>Policy/Evidence base document</b>	CN7
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/14/CN7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan's strategy. Given the challenges we face, there is no other option than to address these head on. Of course, future practice needs to match the good intentions, but whenever there is a perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. The Parish Council supports these policies. Support policies CN1-8 inclusive.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies)</a>

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN7
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/21/CN7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Co-location is very important. For example, below ground.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No



<b>Policy/Evidence base document</b>	CN7
<b>Name of respondent (or client)</b>	Winchester Action on the Climate Crisis (WinACC)
<b>Personal reference number</b>	ANON-AQTS-3B4K-D
<b>Full reference number</b>	ANON-AQTS-3B4K-D/3/CN7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Criterion. (iv) of the policy is negatively worded to the extent that it will discourage the provision of large scale installations. It makes the policy unduly restrictive and conflicts with the objectives of the Council's Climate Emergency declaration.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Large scale installations should not be discouraged.
<b>What is your suggested wording or text for the policy?</b>	Criterion (iv). Proposals for large scale installations should be accompanied by evidence to demonstrate that any noise impact from cooling plans has been acceptably mitigated.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN7
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/15/CN7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	No comment but could not skip through this section
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

Local Plan Reference or document	Policy CN8 Embodied Carbon	
Total Number of Representations received.	17	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	13	3
Sound	6	10
Complies with Duty to Cooperate	16	0
<p><b>Summary of Representations</b></p> <p>There were concerns regarding Policy CN8, primarily relating to embodied carbon and its assessment process. There was an awareness of the significance of embodied carbon in meeting climate targets; however, there were concerns over the absence of consistent data across the construction supply chain, especially among smaller developers, questioning the feasibility of early-stage carbon assessments. There were calls for clearer guidelines within the policy with demands for specific limits at different project stages and the need for alignment with national standards for consistency. Developers, particularly small and medium-sized ones, have pointed out that they may face challenges due to the policy’s current requirements, owing to the limited capacity to effect change in supply chains and the potential strain on development viability. Concerns were raised regarding whether embodied carbon should be governed at a national level in order to ensure uniformity. Overall, while the policy’s goals are supported, comments centred around the need for greater clarity, flexibility, and national compliance to make implementation practical and fair across different developer sizes.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/2/CN8</b></p> <p>ANON-AQTS-3BSY-T/7/CN8</p> <p>ANON-AQTS-3B4K-D/1/CN8</p> <p><b>ANON-AQTS-32CD-5 - Colden Common Parish Council/3/CN8</b></p> <p>ANON-AQTS-32GC-8/1/CN8</p> <p>ANON-AQTS-32GG-C/1/CN8</p> <p>ANON-AQTS-32NS-Y/1/CN8</p> <p>ANON-AQTS-329Q-8/2/CN8</p> <p>ANON-AQTS-32U5-8/1/CN8</p> <p>ANON-AQTS-3274-9/1/CN8</p> <p>ANON-AQTS-3BQA-Z/1/CN8</p> <p>ANON-AQTS-3BBP-Z/1/CN8</p> <p>ANON-AQTS-327B-Q/1/CN8</p>		

BHLF-AQTS-328Q-7/2/CN8

BHLF-AQTS-328X-E/2/CN8

BHLF-AQTS-3286-C/2/CN8

BHLF-AQTS-328G-W/2/CN8

**Main issues raised in representations received in regulation 19 consultation.**

- Concerns regarding Policy CN8, primarily relate to embodied carbon and its assessment process;
- Concerns over the absence of consistent data across the construction supply chain, especially among smaller developers, questioning the feasibility of early-stage carbon assessments;
- Calls for clearer guidelines within the policy with demands for specific limits at different project stages and alignment with national standards for consistency.
- Whether embodied carbon should be governed at a national level to ensure uniformity; and
- While the policy's goals are supported, comments centred around the need for greater clarity, flexibility, and national compliance to make implementation practical and fair across different developer sizes.

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/2/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan's strategy. Given the challenges we face, there is no other option than to address these head on. Of course, future practice needs to match the good intentions, but whenever there is a perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. The Parish Council supports these policies. Support policies CN1-8 inclusive.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies)</a>

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/7/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Re-using materials is very important.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No



<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Winchester Action on the Climate Crisis (WinACC)
<b>Personal reference number</b>	ANON-AQTS-3B4K-D
<b>Full reference number</b>	ANON-AQTS-3B4K-D/1/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy CN8 is unsound because it does not fully align with NPPF Chapter 2, Paragraph 8(c) and Chapter 14, Paragraphs 157-158. The policy as currently written prioritises data collection on embodied carbon without need to meet a lower embodied carbon target, which is crucial given the significance of embodied carbon in overall carbon emissions from construction projects.</p> <p>Rationale - Embodied carbon often accounts for 20-50% of a building's total lifecycle carbon emissions. Reducing these emissions is vital to achieving the District and UK's net-zero goals. While national embodied carbon standards are still evolving, local authorities have the responsibility to adopt robust frameworks, such as the RICS Whole Life Carbon Assessment or UK Green Building Council (UKGBC) guidelines, to measure and set targets for reducing embodied carbon.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	To ensure consistency with national climate targets and the City Council's climate emergency declaration, Policy CN8 should mandate the use of established embodied carbon assessment methodologies with a realistic target for new developments and not just the collection of data.
<b>What is your suggested wording or text for the policy?</b>	<p>Embodied Carbon Targets: "Major residential and non-residential developments must calculate and demonstrate how they will achieve low embodied carbon outcomes using the RICS Whole Life Carbon Assessment for the Built Environment."</p> <p>Integration with Carbon Reporting: "The agreed embodied carbon targets must be included in the Energy and Carbon Statement required by Policy CN1 and should detail the proposed embodied carbon reduction measures."</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>
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<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/3/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	No comment but could not skip through this section
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Mandy Owen (Boyer) on behalf of Vistry Partnerships
<b>Personal reference number</b>	ANON-AQTS-32GC-8
<b>Full reference number</b>	ANON-AQTS-32GC-8/1/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The ability to undertake an accurate whole life carbon assessment is impinged by the lack of data across building material as to their embodied carbon. Until there is greater accuracy, such assessments will not be accurate.</p> <p>It is highly unlikely that developers will know all materials to be used in a construction at the point of submission of an application. Details of materials is determined following the grant of planning permission and any embodied carbon report to be submitted with an application will not be accurate at that early stage.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Remove the requirement for an embodied carbon report until there is sufficient data to ensure the reports are accurate.
<b>What is your suggested wording or text for the policy?</b>	Remove the requirement for an embodied carbon report until there is sufficient data to ensure the reports are accurate.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	<p>Yes</p> <p><a href="#">Letter (commenting on policies and evidence base - includes tables)</a></p> <p><a href="#">Supporting document 1 (Affordable Housing Statement)</a></p> <p><a href="#">Supporting document 2 (Vision Document 1 - Pitt Vale)</a></p> <p><a href="#">Supporting document 3 (Vision Document 2)</a></p> <p><a href="#">Supporting document 4 (Landscape and Visual Technical Note)</a></p> <p><a href="#">Supporting document 5 (Biodiversity Net Gain Feasibility Report)</a></p>

*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Mark Behrendt
<b>Personal reference number</b>	ANON-AQTS-32GG-C
<b>Full reference number</b>	ANON-AQTS-32GG-C/1/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>HBF is concerned that the requirement to undertake an accurate whole life carbon assessment is compromised by the lack of data across building material as to their embodied carbon. Until there is greater accuracy, we question whether the whole life carbon assessments can be sufficiently robust at present to be part of decision making.</p> <p>As with reducing carbon emissions from operational energy use HBF considers it best that such matters addressed at a national level to avoid different approaches and standard being set in different areas. The housebuilding industry is working with the Future Homes Hub it to develop a roadmap to reducing embodied carbon and whilst Council's may want to go further faster HBF have concerns that this will impact on the deliverability of development with a disproportionate impact on SME developers.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	<p>Yes</p> <p><a href="#">Form (copy of form - refers to letter)</a></p> <p><a href="#">Letter (Commenting on policies and evidence base)</a></p>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Catesby Estates
<b>Personal reference number</b>	ANON-AQTS-32NS-Y
<b>Full reference number</b>	ANON-AQTS-32NS-Y/1/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>While Catesby supports the transition to net zero carbon, it is concerned that the construction industry, specifically the manufacturing supply chain, cannot yet provide consistent data on the embodied carbon of any inputs. While this is gradually changing, robust data tends to be available from large tier-1 suppliers. In contrast, data from subsequent actors in the supply chain is much more inconsistent. Linked to this, the capacity of a large national housebuilder to influence their supply chains (to ensure they achieve zero embodied carbon) is evidently going to be much more significant when compared to an SME developer, which suggests the policy may have a disproportionate impact on small/medium scale developers.</p> <p>Consideration also needs to be given to whether requiring developers to assess embodied carbon within the materiality of a building(s) represents an appropriate matter for a Council's Local Plan. In Catesby's view, this issue is more appropriately positioned at the national level (through Building Regulations) to avoid a proliferation/patchwork of various standards being applied. Likewise, regard should be given to the availability of information at different points in the development process. An Outline planning application is (by definition) unlikely to provide details of a proposed design, including building fabric and materiality.</p> <p>Overall, Catesby considers Policy CN8 to be ineffective and not justified.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The policy should be deleted.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate



<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Supporting document 1 (Location Plan - Land off Titchfield Lane, Wickham)</a></p> <p><a href="#">Supporting document 2 (Vision Framework)</a></p> <p><a href="#">Supporting document 3 (Concept Plan)</a></p> <p><a href="#">Supporting document 4 (Integrated Impact Assessment comments)</a></p>
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<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/2/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Whilst it is laudable to seek buildings to be designed in a way that are flexible and adaptable as stated in paragraph 4.52, it is not possible to know now how buildings might be used in 15-20 years' time, towards the end of the plan period and this should be acknowledged.</p> <p>The need to reduce embodied carbon, where possible, is recognised by Bloor Homes, however, as currently worded, Policy CN8 is unclear as to what should be included in the assessment. This should be clarified as the evidence bases informing this policy refers to two different assessments, upfront embodied carbon and lifecycle embodied carbon.</p> <p>In addition, and as set out in Bloor's response to energy efficiency, the level of detail required to undertake an embodied carbon assessment will not be known at outline application stage and it would therefore not be reasonable to expect such calculations to be carried out at this stage. This should be made clear in the policy through the addition of the following wording:</p> <p>Outline applications are not expected to undertake assessment of embodied carbon emissions, although this can be provided during Reserved Matters Applications.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Whilst it is laudable to seek buildings to be designed in a way that are flexible and adaptable as stated in paragraph 4.52, it is not possible to know now how buildings might be used in 15-20 years' time, towards the end of the plan period and this should be acknowledged.</p> <p>The need to reduce embodied carbon, where possible, is recognised by Bloor Homes, however, as currently worded, Policy CN8 is unclear as to what should be included in the assessment. This should be clarified as the evidence bases informing this policy refers to two different assessments, upfront embodied carbon and lifecycle embodied carbon.</p> <p>In addition, and as set out in Bloor's response to energy efficiency, the level of detail required to undertake an embodied carbon assessment will not be known at outline application stage and it would therefore not be reasonable to expect such calculations to be carried out at this stage. This should be made clear in the policy through the addition of the following wording:</p>

	Outline applications are not expected to undertake assessment of embodied carbon emissions, although this can be provided during Reserved Matters Applications.
<b>What is your suggested wording or text for the policy?</b>	<p>Whilst it is laudable to seek buildings to be designed in a way that are flexible and adaptable as stated in paragraph 4.52, it is not possible to know now how buildings might be used in 15-20 years' time, towards the end of the plan period and this should be acknowledged.</p> <p>The need to reduce embodied carbon, where possible, is recognised by Bloor Homes, however, as currently worded, Policy CN8 is unclear as to what should be included in the assessment. This should be clarified as the evidence bases informing this policy refers to two different assessments, upfront embodied carbon and lifecycle embodied carbon.</p> <p>In addition, and as set out in Bloors response to energy efficiency, the level of detail required to undertake an embodied carbon assessment will not be known at outline application stage and it would therefore not be reasonable to expect such calculations to be carried out at this stage. This should be made clear in the policy through the addition of the following wording:</p> <p>Outline applications are not expected to undertake assessment of embodied carbon emissions, although this can be provided during Reserved Matters Applications.</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	<p>Yes</p> <p><a href="#">Letter (commenting on policies, policies map and evidence base)</a></p> <p><a href="#">Vision document (Land At Mill Lane, Wickham)</a></p>

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Church Commissioners for England
<b>Personal reference number</b>	ANON-AQTS-32U5-8
<b>Full reference number</b>	ANON-AQTS-32U5-8/1/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>We welcome the inclusion of Policy CN8, which reflects comments made in our previous representations on the need for embodied carbon to be reflected in the Plan. However, we would highlight that the policy only requires a Whole Life Carbon Assessment, and for proposals to “address” embodied carbon, but there is no detail as to how the Council envisages embodied carbon reductions. Greater clarity is required on this point, e.g. through specifying embodied carbon limits for various typologies both up front and whole life.</p> <p>The Policy also requires the results of the Whole Life Carbon Assessment to be reported in the Energy and Carbon statement. However, Policy CN1 States that the Energy and Carbon statement needs to be provided and updated at each stage.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The level of detail required in a Whole Life Carbon Assessment (normally undertaken around RIBA stage 4) would clearly be less during the earlier stages, e.g. for an Outline application. This point should be clarified in the policy.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	No

*However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	McCarthy Stone & Churchill Living
<b>Personal reference number</b>	ANON-AQTS-3274-9
<b>Full reference number</b>	ANON-AQTS-3274-9/1/CN8
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that these housing typologies should be robustly assessed in the Local Plan Viability Assessment.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Policy CN8 requires development to undertake an embodied carbon assessment. As such we would like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). The introduction of an embodied carbon policy must not be so inflexible that it deems sites unviable, and any future policy needs to ensure this to make sure it is consistent with NPPF/PPG and can justified by the council. The viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment.</p> <p>Additionally, new development will often be far more sustainable in many circumstances including building fabric by use of modern methods of construction but also extending beyond that, such as sustainability through optimisation of use of a site. The council also need to verify that embodied carbon figures are available to developers from suppliers through an Environmental Product Declaration as in our experience this is not yet readily available from the majority of suppliers.</p>
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (Commenting on policies)</a>

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/1/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Policy CN8 Embodied Carbon Assessment sets out that “To contribute towards the City Council’s climate emergency and national climate targets as part of the design process, major residential and non-residential developments should calculate and supply information on the outcome of an embodied carbon assessment which follows the ‘RICS Whole Life Carbon Assessment for the Built Environment’ methodology or through a nationally recognised assessment. The outcome of the embodied carbon assessment should be included in the Energy and Carbon Statement that is a requirement of Policy CN1 and demonstrate what actions have been taken in the design process to ensure that as far as possible the proposal addresses embodied carbon”.</p> <p>The need to reduce embodied carbon where possible is supported by Bloor. However, the current policy wording is unclear as to which lifecycle stages should be included in the assessment. The ‘Carbon Neutrality and Embodied Carbon Topic Paper’ and ‘Embodied Carbon Policy Options’ documents included as part of the evidence base make reference to both upfront embodied carbon and lifecycle embodied carbon. As these two assessments measure carbon across different lifecycle stages, it is currently unclear what applicants are expected to assess. Confirmation is also required that detailed assessment of embodied carbon will not be possible for outline applications. Given the level of detail provided for an outline application, details of materials and construction methods are not defined, and as such, it is not reasonable to expect this policy to be met at the outline stage, although commitments should be sought from developers to adhere to the objectives, with further details to be confirmed during Reserved Matters Applications</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Policy CN8 Embodied Carbon Assessment sets out that “To contribute towards the City Council’s climate emergency and national climate targets as part of the design process, major residential and non-residential developments should calculate and supply information on the outcome of an embodied carbon assessment which follows the ‘RICS Whole Life Carbon Assessment for the Built Environment’ methodology or through a</p>



	<p>nationally recognised assessment. The outcome of the embodied carbon assessment should be included in the Energy and Carbon Statement that is a requirement of Policy CN1 and demonstrate what actions have been taken in the design process to ensure that as far as possible the proposal addresses embodied carbon”.</p> <p>The need to reduce embodied carbon where possible is supported by Bloor. However, the current policy wording is unclear as to which lifecycle stages should be included in the assessment. The ‘Carbon Neutrality and Embodied Carbon Topic Paper’ and ‘Embodied Carbon Policy Options’ documents included as part of the evidence base make reference to both upfront embodied carbon and lifecycle embodied carbon. As these two assessments measure carbon across different lifecycle stages, it is currently unclear what applicants are expected to assess. Confirmation is also required that detailed assessment of embodied carbon will not be possible for outline applications. Given the level of detail provided for an outline application, details of materials and construction methods are not defined, and as such, it is not reasonable to expect this policy to be met at the outline stage, although commitments should be sought from developers to adhere to the objectives, with further details to be confirmed during Reserved Matters Applications</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Revised Policy CN8 - Embodied Carbon Assessment</p> <p>To contribute towards the City Council’s climate emergency and national climate targets as part of the design process, major residential and non-residential developments should calculate and supply information on the outcome of an embodied carbon assessment which follows the ‘RICS Whole Life Carbon Assessment for the Built Environment’ methodology or through a nationally recognised assessment, covering lifecycle stages A1-A5, B1-B5, C1-C4. The outcome of the embodied carbon assessment should be included in the Energy and Carbon Statement that is a requirement of Policy CN1 and demonstrate what actions have been taken in the design process to ensure that as far as possible the proposal addresses embodied carbon. Outline applications are not expected to undertake assessment of embodied carbon emissions, although this can be provided during Reserved Matters Applications.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on Policies &amp; Evidence Base)</a>  <a href="#">Supporting document 1 (South Winchester Vision Document)</a>  <a href="#">Supporting document 2 (Response to the delivery of housing)</a>  <a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a>  <a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a>  <a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a></p>

*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Andrew Uwins
<b>Personal reference number</b>	ANON-AQTS-3BBP-Z
<b>Full reference number</b>	ANON-AQTS-3BBP-Z/1/CN8
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>There is concern that the requirement to undertake an accurate whole life carbon assessment is compromised by the lack of data across building material as to their embodied carbon. Until there is greater accuracy, we question whether the whole life carbon assessments can be sufficiently robust at present to be part of decision making.</p> <p>As with reducing carbon emissions from operational energy use Hazeley considers it best that such matters addressed at a national level to avoid the fragmentation of approaches and standard across different areas.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies - includes pictures)</a>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Alice Lack
<b>Personal reference number</b>	ANON-AQTS-327B-Q
<b>Full reference number</b>	ANON-AQTS-327B-Q/1/CN8
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Welbeck considers it best that such matters addressed at a national level to avoid the fragmentation of approaches and standard across different areas. As detailed by the HBF, the housebuilding industry is working with the Future Homes Hub to develop a roadmap to reducing embodied carbon and whilst Council's may want to go further faster, there are concerns that this will impact on the deliverability of development with a disproportionate impact on SME developers and sites such as Mount Edgecombe Farm.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on Policies)</a>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Georgina Cox
<b>Personal reference number</b>	BHLF-AQTS-328Q-7
<b>Full reference number</b>	BHLF-AQTS-328Q-7/2/CN8
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Gadman recognises the Council's ambitions around climate change and agree for proposals to undertake an embodied carbon assessment following the RICS Whole Life Carbon Assessment for the Built Environment or through using another nationally recognised assessment.</p> <p>Gladman suggests the need for flexibility until there is greater accuracy regarding data across different building material types and their embodied carbon. The results from the above assessments will then be used as a guide to demonstrate what actions have been implemented in the design process to best address embodied carbon.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Supporting information (commenting on policies and proposed site)</a>

*However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*



<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/2/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Wates raises no objection with the principle of proposed Policy CN8, and it recognises the need to manage embodied carbons. However, it is likely that this will have a national standard in development techniques in the short to medium term. It is right that matters of this importance and national application are managed at a national level, but there is not any current national policy or guidance at this time, therefore its explicit inclusion in the Local Plan is questioned.</p> <p>4.16 Wates welcomes the fact that there are no ‘targets’ introduced in the proposed policy, but it does question how the Council proposes to assess the feasibility of demolition or re-use of various buildings. Also, Wates suggests that the operational needs of buildings and businesses, should be considered more clearly in this policy, and if a building is no longer fit for its intended purpose, then this should weigh in favour of its removal.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	<p>Yes</p> <p><a href="#">Form (refers to letter)</a></p> <p><a href="#">Letter (commenting on policies and evidence base)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-3286-C
<b>Full reference number</b>	BHLF-AQTS-3286-C/2/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website  Legally compliant Yes Positively prepared Yes  Sound Yes Justified Yes  Compliant with the duty to cooperate  Yes  Effective Yes  Compliant with national policy Yes</p> <p>Wates raises no objection with the principle of proposed Policy CN8, and it recognises the need to manage embodied carbons. However, it is likely that this will have a national standard in development techniques in the short to medium term. It is right that matters of this importance and national application are managed at a national level, but there is not any current national policy or guidance at this time, therefore its explicit inclusion in the Local Plan is questioned.</p> <p>Wates welcomes the fact that there are no 'targets' introduced in the proposed policy, but it does question how the Council proposes to assess the feasibility of demolition or re-use of various buildings. Also, Wates suggests that the operational needs of buildings and businesses, should be considered more clearly in this policy, and if a building is no longer fit for its intended purpose, then this should weigh in favour of its removal.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (Commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	CN8
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-328G-W
<b>Full reference number</b>	BHLF-AQTS-328G-W/2/CN8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website  Legally compliant Yes  Positively prepared Yes  Sound Yes  Justified Yes  Compliant with the duty to cooperate Yes  Effective Yes  Compliant with national policy Yes</p> <p>Wates raises no objection with the principle of proposed Policy CN8, and it recognises the need to manage embodied carbons. However, it is likely that this will have a national standard in development techniques in the short to medium term. It is right that matters of this importance and national application are managed at a national level, but there is not any current national policy or guidance at this time, therefore its explicit inclusion in the Local Plan is questioned.</p> <p>4.16 Wates welcomes the fact that there are no 'targets' introduced in the proposed policy, but it does question how the Council proposes to assess the feasibility of demolition or re-use of various buildings. Also, Wates suggests that the operational needs of buildings and businesses, should be considered more clearly in this policy, and if a building is no longer fit for its intended purpose, then this should weigh in favour of its removal.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies)</a>

**WCC Response.**

Comments noted.

The [Carbon Neutrality and Embodied Carbon Topic Paper](#) has been updated (November 2024) and includes a section on embodied carbon.

**WCC Recommended Changes arising from representations:**

None.